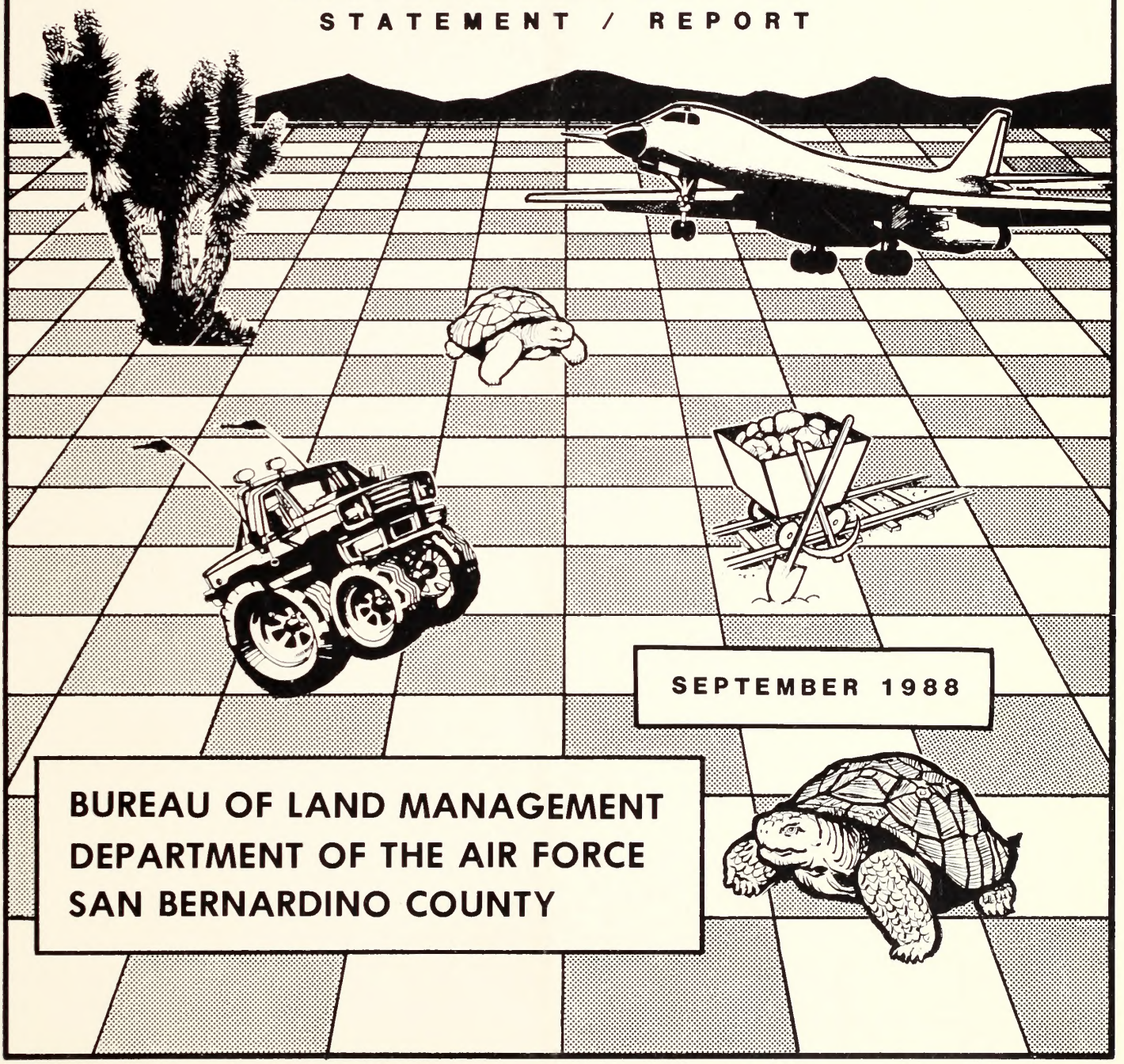
BLM LIBRARY
88065652

WESTERN MOJAVE LAND TENURE ADJUSTMENT PROJECT

FINAL

ENVIRONMENTAL IMPACT STATEMENT / REPORT



SEPTEMBER 1988

BUREAU OF LAND MANAGEMENT
DEPARTMENT OF THE AIR FORCE
SAN BERNARDINO COUNTY

IN REPLY REFER TO:

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
CALIFORNIA DESERT DISTRICT
1695 Spruce Street
Riverside, California 92507

2000 (DoD)
(CA-068.21)

Dear Reader:

Enclosed for your review is the final environmental impact statement/ environmental impact report (EIS/EIR) and proposed amendment to the California Desert Plan for the Western Mojave Land Tenure Adjustment Project. The final EIS/EIR has been prepared in an abbreviated format consistent with provisions of Section 1500 of 40 Code of Federal Regulations, Council of Environmental Quality's regulations for implementing the National Environmental Policy Act of 1969, and the State of California 1986 Guidelines for the California Environmental Quality Act. Text revisions or additions made in response to public suggestions are also presented. Therefore, this document, together with the draft EIS/EIR constitutes the final EIS/EIR.

My thanks to those of you who commented on our draft EIS/EIR and who attended our public meetings. Your comments have been incorporated into our final analysis and have resulted in a new preferred alternative for the project proposal.

A 30-day period is provided for public review beginning the date that this EIS/EIR is filed with the Environmental Protection Agency as announced in the Federal Register. Comments should be sent to the LTA Project Manager, 150 Coolwater Lane, Barstow, CA 92311. Shortly after this period the final decision will be announced.

Protests should be sent to the State Director, Bureau of Land Management, 2800 Cottage Way, Room E-2841, Sacramento, CA 95825 within the same 30 day period. Protests should provide all pertinent information concerning the protest, including: name, address, telephone number, and interest of the protesting party; copies of all documentation submitted during the public involvement process; and a concise statement explaining why the proposed plan amendment is believed to be wrong.

Thank you for your participation in the plan amendment process.

Sincerely,

H W Ricker

Gerald E. Hillier
District Manager

18761011 88065652 HD 243 .C2 M6584 1988

COVER SHEET

WESTERN MOJAVE LAND TENURE ADJUSTMENT PROJECT

( ) DRAFT (x) FINAL

NEPA Lead Agency	U.S. Department of the Interior Bureau of Land Management California Desert District
CEQA Lead Agency	County of San Bernardino
Cooperating Agency	U.S. Department of the Air Force Edwards Air Force Base George Air Force Base
Counties that could be affected	San Bernardino Kern, Los Angeles

The Western Mojave Land Tenure Adjustment (LTA) project addresses the concerns of three agencies: the Air Force, the Bureau of Land Management (BLM), and the County of San Bernardino. The BLM desires to consolidate its checkerboard landownership pattern in several areas containing sensitive resources. The County would like to be able to guide urban development in the region to avoid a random, scattered pattern of "leapfrog" development. The Air Force wished to ensure that airspace in the LTA project area remain usable in the future.

To meet the needs of the agencies, six alternatives/approaches to guiding the project area's long-term landownership pattern and agency land use guidelines, including a No Action alternative, were analyzed in the draft EIS/EIR. A seventh project alternative was developed in response to public comments received on the draft EIS/EIR, and constitutes the agency's final preferred alternative. This preferred alternative, if approved, will constitute an amendment to the California Desert Plan.

For further information contact:

Karla Swanson
Barstow Resource Area
Bureau of Land Management
150 Coolwater Lane
Barstow, CA 92311

Ed Hastey

SEP 14 1988

STATE DIRECTOR

EXECUTIVE SUMMARY

INTRODUCTION

The final environmental impact statement/environmental impact report (EIS/EIR) for the Western Mojave Land Tenure Adjustment (LTA) Project presents the final preferred plan amendment alternative for the LTA Project. The preferred alternative has been modified from that addressed in the draft EIS/EIR and is discussed in detail in this document.

The LTA Project area contains 2.8 million acres, potentially affecting portions of San Bernardino, Kern, and Los Angeles counties. Within the project area approximately 350,000 acres of private land and public lands would be exchanged in a voluntary, value for value, exchange program in the final proposal. Public lands would be administered by the Bureau of Land Management (BLM) for multiple use management including natural resources and for consistency with U.S. Air Force airspace uses. The proposed plan amendment would identify those private lands to be acquired and placed in BLM's "limited" multiple use classification and also identify those public lands to be "unclassified" and available as the selected land exchange base for project implementation. A second tier environmental and value analysis would be performed prior to authorization of any land exchanges. Private lands would be zoned and used according to the affected county government plans. The county of San Bernardino would consider zoning constraints for private lands remaining interspersed with public lands or affecting flight areas.

Implementation of this project would be subject to available funding.

HOW TO USE THIS DOCUMENT

The focus of this final EIS/EIR is on the new project proposal/preferred plan amendment alternative. The document presents a complete, comprehensive description of the final proposal in Chapter 2. Portions of the draft EIS/EIR have not been reprinted. This document should be used together with the draft EIS/EIR to get a full description of all alternatives and their potential environmental impacts.

The maps in the draft EIS/EIR are an integral part of the project proposal. They have not been reprinted for this document. A map of the new proposal is provided.

The Executive Summary of the draft EIS/EIR is incorporated by reference. The Summary Table of Impacts has been revised and is reprinted for clarity and to show comparison between all alternatives including the new project proposal.

Chapter 1 of the draft EIS/EIR is not reprinted in this document. It describes the purpose and need for the project and associated plan amendment which has not changed.

Chapter 2 has not been reprinted in its entirety. For a description of the initial six alternatives (I through VI), the reader should refer to Chapter 2 of the draft EIS/EIR. In this document, Chapter 2 contains a complete description of the new project proposal/preferred plan amendment. The final project proposal responds to comments received from the public, specifically those concerning habitat requirements of the desert tortoise. In addition, the critical needs of George Air Force Base Ingress/Egress Corridor were redefined; and additional public land disposal areas were identified. The final proposal contains portions of several of the previously defined alternatives (IV, V, and VI.) The final project proposal remains entirely within the defined LTA project boundary.

Chapter 3 (Affected Environment) has not been reprinted. A supplement to that chapter is presented in this document to correct the omission of the Western Mojave Saltbush Research Natural Area from the draft chapter. For a description of the complete environment potentially affected by this project, the reader should refer to the draft EIS/EIR.

Chapter 4 (Environmental Consequences) has not been reprinted. A supplement to that chapter, to describe in detail the effects of the final project proposal is provided in this document. Note that the impacts projected in this supplement fall within the scope of those discussed in detail in the draft EIS/EIR.

Chapter 5 of the draft EIS/EIR describes the Consultation and Coordination processes for draft plan amendment EIS/EIR analysis. It has not been reprinted, however, a supplement which describes additional public consultation and coordination occurring since issuance of the draft EIS/EIR is contained in this document.

Chapter 6 is a new chapter. It includes the Additions, Corrections and Deletions which are minor changes to the sections of the draft EIS/EIR which are not reprinted.

Chapter 7 presents comments which were received on the draft EIS/EIR and our responses to them.

The appendices A, B, and C are incorporated by reference from the draft EIS/EIR.

SUMMARY OF IMPACTS TABLE

(This table replaces the Summary of Impacts Table on pages v and 2-15 of the draft EIS/EIR)

General Assumptions

It is assumed that a large percentage of land would be exchanged under all alternatives and that private land remaining in consolidation zones would be managed by County zoning. It is also assumed that the same level of development of private lands would occur under all alternatives.

Continuum of Impacts

These resource values or land uses would be similarly affected under all alternatives: Air Resources, Water Resources, Utility Corridors, Noise, Geology, Soils, Socioeconomics, Agriculture, T&E Species, Native American Values. These similar impacts range from slight to no impact as a result of potential decisions to be reached from this analysis.

Other potential impacts are displayed below and ranked according to relative impact level.

Specific Assumptions	Most Adverse Impact	Most Beneficial Impact
Ability to Meet Project Needs: Multiple Agency objectives are part of the project purpose and need. Existing checkerboard ownership causes scattered development with threats to resource management by BLM, airspace use by the Air Force, and logical and orderly development of private lands as overseen by the County. Consolidation of public lands through exchange for isolated public lands reduces these threats.	Checkerboard Ownership; Scattered development; Resource Management Threatened; County Development uncontrolled. I, II, III, IV,	Consolidated Ownership; Community Centered Development; Resource Management Possible; County Development Controllable. VI, V, VII
Protection of Natural Resources: BLM management of consolidated lands would provide better protection for natural resources. Development on intermingled private land can jeopardize natural resources by limiting the protection provided by BLM management.	Least protection for wildlife habitat, ACECs, WSA, vegetation, cultural, paleontological, visual and aesthetic resources. I, II, IV, III	Greatest protection for wildlife habitat, ACECs, WSA, vegetation, cultural, paleontological, visual and aesthetic resources. VI, VII, V
Protection of the Air Force Mission: BLM management of consolidated public lands would conflict less with the Air Force use of airspace than privately-owned and developed lands.	Least protection for the Air Force Mission I, II, III, VI,	Greatest protection for the Air Force Mission. IV, VII, V
County Ability to Manage and Direct Development of Private Lands: It is easier to provide county services to new developments near existing communities. Where private lands are intermingled with public lands, county services are difficult to provide.	Least ability of County to manage and direct development of private lands. I, II, III, IV,	Greatest ability of County to direct and manage development of private lands. V, VI, VII
Commodity Production from Public Land: Scattered public lands encourage uses such as mining and livestock grazing to occur over a larger area. For livestock grazing - the use of public lands often results in the opportunity to use adjacent private lands. For mining a larger regional distribution of public lands allows miners to explore and develop many different areas of a region. In addition, the "M" classification for retained public land/private patterns allows commodity production more than does "L".	Least opportunity for commodity production from public lands (mining, livestock grazing). IV, III, VI, VII,	Greatest opportunity for commodity production (mining, livestock grazing). V, II, I
BLM Ability to Manage: A consolidated area of public land is easier to manage than one interapersed with private land uses and users that cannot be controlled by BLM. Private land uses and users often create adverse impacts to adjacent public lands.	Least ability of BLM to manage land uses and natural resources on public lands. I, II, III, V,	Greatest ability of BLM to manage land uses and natural resources on public lands. IV, VI, VII
Recreation and Public Access: Consolidation of public lands provides easier public access. Interspersed private lands may have fences with closed or locked gates, or private landowners may use other means to control or discourage access across their property. Public recreation opportunities such as camping, hiking, and enjoyment of nature are better served under consolidation.	Least access for public onto public lands. I, II, III, IV,	Greatest access for public onto public lands. VI, VII, V
Feasibility of Alternative under Voluntary Exchange Scenario: To achieve objectives set in the purpose and need of the project using a voluntary exchange scenario, the approximate values of public lands to be disposed of and private lands to be acquired, should be near to equal. If private value is greater than public value, BLM could not acquire sufficient private inholdings in the consolidation zones. If public value exceeds private value, then numerous hard to manage "unclassified" lands remain.	Private Land Values Greater than Public/ V, II,	Public Land Values Greater than Private/ IV, I, VI, Close to Equal Land Values III, VII

The number of each alternative has been placed in its relative position to other alternatives with those on the left indicating a more adverse impact and those on the right, a more beneficial impact when using the specific assumptions stated.

TABLE OF CONTENTS

	Page
Cover Sheet	i
Executive Summary	iii
Introduction	iii
How to Use This Document	iii
Table of Contents	vi
List of Figures	vii
List of Tables	vii
2. FINAL PROPOSAL/PREFERRED ALTERNATIVE	2-1
2.4.7 ALTERNATIVE VII	2-1
2.4.7.1 Landownership Pattern	2-1
2.4.7.2 Multiple Use Classifications	2-1
2.4.7.3 Land Use Categories	2-2
2.4.7.4 Public Health and Safety	2-2
3. AFFECTED ENVIRONMENT	3-1
3.5.1.7 Western Mojave Saltbush Research Natural Area	3-1
4. ENVIRONMENTAL CONSEQUENCES	4-1
4.7 ALTERNATIVE VII (FINAL PROJECT PROPOSAL)	4-1
4.7.1 Resources Not Impacted by the Alternative.	4-1
4.7.2 Physical Environment.	4-1
4.7.3 Biological Environment.	4-2
4.7.4 Human Environment	4-3
4.7.5 Land Uses and Patterns.	4-7
5. CONSULTATION AND COORDINATION	5-1
5.3 PUBLIC PARTICIPATION BETWEEN DRAFT AND FINAL EIS/EIR	5-1
6. ADDITIONS, DELETIONS, AND CORRECTIONS	6-1
7. COMMENTS AND RESPONSES	7-1
7.0 INTRODUCTION	7-1
7.1 SUMMARY OF COMMENTS FROM PUBLIC MEETINGS	7-1
7.2 COMMENT LETTERS.	7-1

LIST OF FIGURES

NUMBER		Page
2.7	LTA Project Area, Alternative VII (Proposed Action). . .	2-3

LIST OF TABLES

NUMBER		Page
	SUMMARY OF IMPACTS TABLE	v
A 4.1/4.2	ADDENDUM TO TABLES 4.1/4.2	4-4
4.A	NET GAIN OR LOSS OF DESERT TORTOISE.	4-4
A 4.6	ADDENDUM TO TABLE 4.6	4-5
4.15	GRAZING ALLOTMENT RELATIONSHIPS FOR ALTERNATIVE VII..	4-10
A 4.10	ADDENDUM TO TABLE 4.10	4-11
6.1	ADDITIONS, DELETIONS AND CORRECTIONS TABLE	6-2
7.1	LIST OF COMMENTORS	7-2
7.2	COMMENTS & RESPONSES	7-3

2.4.7 ALTERNATIVE VII - FINAL PROJECT PROPOSAL (see Fig. 2.7)

Alternative VII was developed following intensive review of previously defined alternatives and public comments received on the draft EIS/EIR. Changes from the previous proposed action (Alternative VI) include: an additional consolidation area around Kramer Hills and north of Kramer Junction; additional retention areas between Kramer Hills and Iron Mountain, and north of Barstow; a change from retention to disposal for the Quartzite Mountain area, the area surrounding Boron, and for some of the wind energy generation area in Kern County. A change in the proposal for the Ingress/Egress Corridor to George Air Force Base was also made. Here Accident Potential Zones 1 and 2, an area 3,000 feet wide by 12,000 feet long, extending from the end of the north runway would be consolidated under public ownership through the voluntary exchange processes common to the entire LTA Project.

This alternative includes a level of benefit to the functions of all three agencies by promoting management of contiguous areas and the resources or resource values of concern. Impacts to resource values from this alternative include: loss of Mohave vole habitat; loss of portions of grazing allotments; and loss of the ability to expand certain mining operations on public lands that would be transferred to private ownership.

2.4.7.1 Landownership Pattern

Private land in the consolidation zone under this alternative totals 238,080 acres. This land has been identified as priority by BLM and DoD for resource management and mission protection, and has been expanded to include additional acreage to protect additional desert tortoise habitat. A total of 70,965 acres of public land is included in the retention zone; the additional acres proposed would provide further protection for desert tortoise habitat. Disposal lands are necessary to provide for the exchange processes; 108,160 acres are included in the public land disposal zones.

2.4.7.2 Multiple Use Classifications

Public land in the consolidation zone (327,680 acres) would be designated Class L to minimize future conflicts with DoD activities and to protect natural resources and resource values on public lands. (Section 3.5.1 in the draft EIS/EIR defines multiple use land classifications.) Public land in the retention zone (70,965 acres) would remain in existing classifications. Land in the disposal zone (108,160 acres) would be designated as unclassified.

The "unclassified" designation creates a disposal base for land exchange within the LTA Project. The reader should be aware that an "unclassified" designation may make those public lands in the disposal zones available for exchange with other projects if determined to be in the public interest, under BLM regulations concerning land exchanges.

2.4.7.3 Land Use Categories

Private land in the consolidation zone (238,080 acres) would be considered for a Rural Conservation designation to avoid future conflicts with DoD activities or with BLM management objectives. Most of this land is currently within the Rural Conservation designation (see Figure 3.5 in the draft EIS/EIR). The County of San Bernardino would consider limiting development of private lands within the retention zones (56,960 acres) to a maximum intensity of a Rural Living classification; currently areas within the retention zone are classified for Rural Conservation or for Rural Living. No change in land use category/county zoning would be considered in the disposal zones (108,160 acres) solely as a result of the LTA Project. (See Section 3.5.2 in the draft EIS/EIR for definitions of land use categories.)

2.4.7.4 Public Health and Safety

A Safety-Noise Overlay, reflecting the criteria depicted in Appendix C (draft EIS/EIR), would be considered for the consolidation and retention zones within the supersonic/low level to medium level flight and ingress/egress corridor areas, alerting local citizens to potential hazards and providing a basis of consideration in land use decision making. Citizen notification of potential hazards would reduce conflicts between private land use and the Air Force mission.

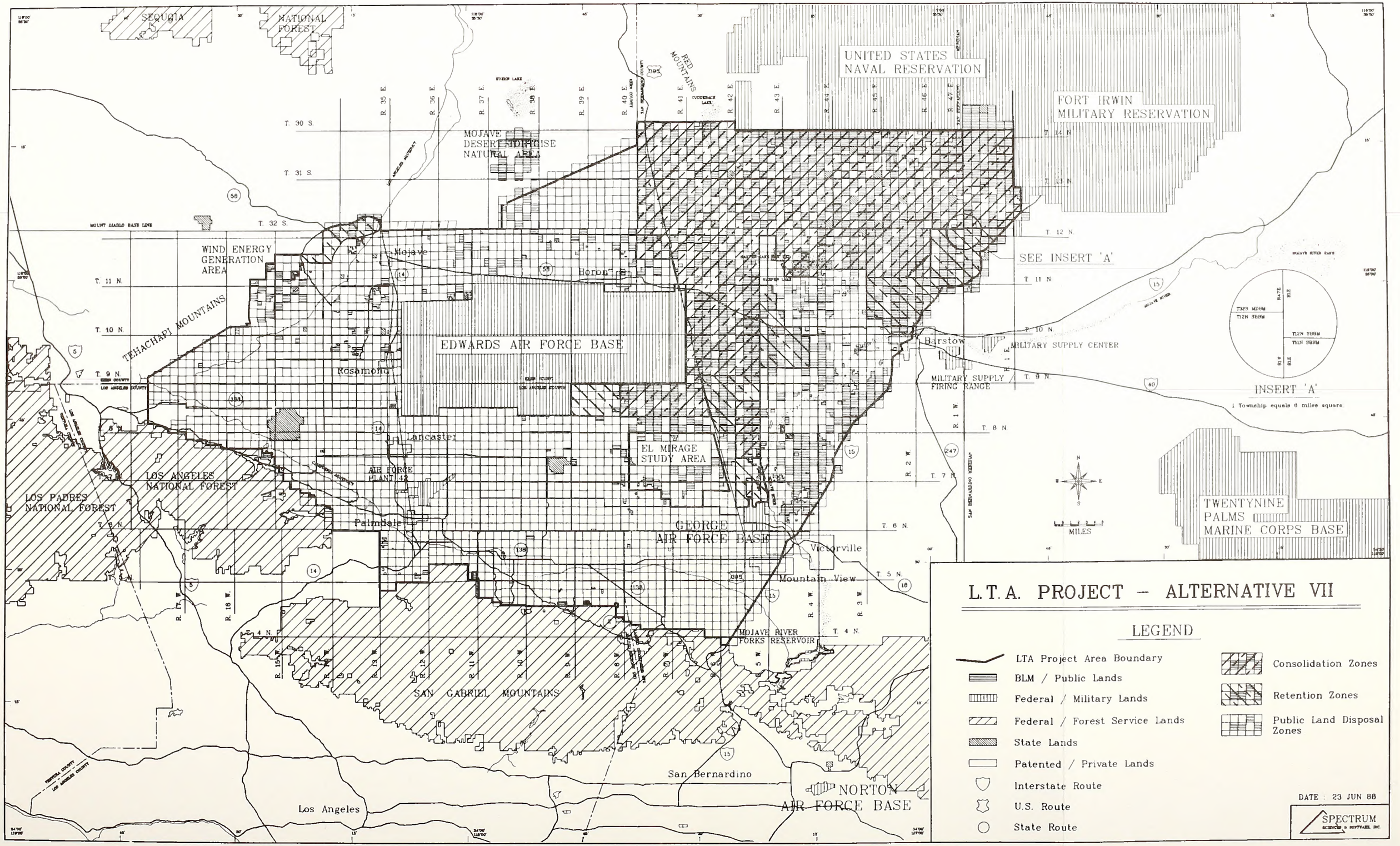


FIGURE 2.7 ALTERNATIVE VII MAP

3.5.1.7 Western Mojave Saltbush Research Natural Area

BLM has the authority to designate Research Natural Areas (RNAs) under 43 CFR 8223. These Natural Areas are established and maintained for the primary purpose of research and education because the lands possess one or more of the following characteristics:

1. A typical representation of a common plant or animal association.
2. An unusual plant or animal association.
3. A threatened or endangered plant or animal species.
4. A typical representation of common geologic, soil, or water features.
5. Outstanding or unusual geologic, soil, or water features.

The Western Mojave Saltbush Research Natural Area was designated as a Special Area in the California Desert Plan. This designation reflects the interest in the Western Mojave Saltbush Unusual Plant Assemblage (UPA) and the ecosystem of which it is a part. Some of the other species of interest occurring within the RNA include: desert tortoise, Mohave ground squirrel, and the Barstow woolly sunflower. The RNA is located north of Kramer Junction, east of Highway 395, and south of Fremont Peak.

The goals of the Special Areas Program are to:

(1) Recognize significant natural and cultural resources found on BLM-administered lands in the California Desert District;

(2) Provide for other uses in the designated Special Areas, compatible with the protection and enhancement of the significant natural and cultural resources; and,

(3) Systematically monitor the qualities of the significant natural and cultural resources on BLM-administered lands and the compatibility of other allowed uses with these resources.

The Western Mojave Saltbush RNA activity plan will be prepared in FY 1989. This site-specific activity plan will establish the management directives for the RNA. These directives may include common management objectives with habitat and ownership of intermingled private lands acquired by the California Department of Fish and Game.

4.7. ALTERNATIVE VII (FINAL PROJECT PROPOSAL)

4.7.1 RESOURCES NOT IMPACTED BY THE ALTERNATIVE

Resource values or land uses eliminated from discussion under Alternative VII include those eliminated for all alternatives: Native American values, threatened and endangered plants, utility corridors and access, soils, and noise.

4.7.2 PHYSICAL ENVIRONMENT

Impacts to air and water resources would only result if the land is developed by the private landowner following an exchange. The likelihood of this development and the subsequent impacts of that action is discussed in the socioeconomic section.

Air Resources

Air resources in the project area are currently subjected to degradation by localized development. Air quality degradation also occurs as a result of out of basin import (see Section 3.2.1 of the draft EIS/EIR). The overall effect of this alternative on regional air quality is expected to be minimal and concentrated in the Barstow/Victorville - I-15 corridor areas where disposal lands are present. It is not anticipated that these effects would significantly exceed those which will occur under any alternative, including the No Action alternative.

Groundwater Resources

Alternative VII influences private land development to occur near community centers which have existing but limited water sources. The counties require developers to insure adequate water supplies prior to development permit authorizations. While new development anywhere within the project area could create additional demands on the limited Mojave River Aquifer, Alternative VII encourages development in logical areas of community expansion and creates the opportunity for developers to cooperate in importing additional water supplies (such as from the California Aqueduct).

Surface Water Resources

Surface water quality could be degraded by additional pollutant loads to local drainages in Barstow and/or Victorville if development occurs (see Section 3.2.2.2). These increased pollutant and discharge loads are subject to the control of local, state and federal law but could be anticipated based on increases in domestic water uses (RES and RUL areas) and an accompanying increase in run-off. Additional run-off would occur in industrial areas (IND) and commercial (COM) land

use category areas. Protection of surface water quality and drainage channels would be better facilitated by the logical community development offered by Alternative VII.

Paleontological Resources

Consolidation of public landholdings would facilitate more effective management and protection of paleontological resources because of contiguous ownership of public lands. Most known paleontological resources are included in consolidation or retention zones in this alternative. Some presently unidentified paleontological resources may be included on public lands in the disposal zone (see Section 3.2.3 of the draft EIS/EIR). Those resources would be protected under regulations and procedures noted in Section 1.3 of the draft EIS/EIR.

4.7.3 BIOLOGICAL ENVIRONMENT

Wildlife Resources

Alternative VII would result in a net gain of all desert tortoise habitat areas of approximately (19,260 acres) of habitat characterized by historic population densities of 100 or more per square mile. Refer to Figure 3.2 in the draft EIS/EIR for population density areas based on pre-1980 data.

Areas 1, 2, and 3 on Figure 3.2 display historic tortoise densities greater than 250 animals per square mile. Areas 1 and 2 would lose public lands within the disposal zone in Alternative VII because management conflicts on these highly scattered public lands are not likely to be resolvable. Disposal of these public lands through exchange for public lands containing manageable habitat is a beneficial tradeoff.

Areas 4, 5, 6, and 7 (Figure 3.2, draft EIS/EIR) are characterized by tortoise densities between 100-250 tortoise per square mile. Area 4 would have a net loss of public lands for similar reasons as Areas 1 and 3 described above. Areas 5 and 6 would have a net gain in tortoise habitat under Alternative VII. Area 7 would lose habitat in developed areas and acquire lands with better management potential.

Addendums to Tables 4.1 and 4.2 (draft EIR/EIR) are presented below. A new table, 4.A, is provided to present the net losses or increases of tortoise habitat in areas with densities greater than 100 tortoises per square mile for all alternatives.

Mohave vole habitat would be retained and consolidated near Harper Lake, but a loss of habitat would occur with disposal of habitat on public lands along the Mojave River. The Mohave ground squirrel would retain much of its existing habitat in the consolidation and retention zones; but lose a small portion in the disposal zones.

Plant Resources

Plant species of concern which are most likely to be affected by the LTA Project include Eriophyllum mohavense, a category II candidate species, under the federal Endangered Species Act (ESA) and Sclerocactus polyancistrus, a species no longer under review for ESA listing. For both of these species, Alternative VII would place the most viable populations of these species, within the LTA Project area, into consolidation zones. Additional populations occur in retention zones. Scattered populations of Sclerocactus polyancistrus would be in disposal zones. Eriophyllum mohavense also occurs on currently "unclassified" lands south of Harper Dry Lake; these lands would continue as "unclassified" and thus be available for disposal.

Plant populations located in consolidation or retention zones would be afforded the protection associated with uniform management of large, contiguous areas.

Site specific second tier field studies of individual land parcels will be required prior to disposal of public lands. Mitigation measures may be required for the populations of concern to lessen the impact of these losses on the overall populations and species distribution in the Mojave Desert.

The Western Mohave Saltbush UPA will be impacted by changes in landownership (see Table 4.4 in the draft EIS/EIR) and use. Changes in ownership can be summarized into the following categories: consolidation 278,324 acres; retention 46,864 acres, and 54,374 acres in disposal zones. Loss of the acreage in the disposal zone is not anticipated to adversely impact the UPA.

4.7.4 HUMAN ENVIRONMENT

Cultural Resources

In the proposed alternative, approximately 240 known cultural resource sites would be located on public lands within consolidation and retention zones, an increase of about 100 sites over the existing condition. The estimated known site figures for this alternative would be as follows: public - 247; private/state - 86; and unknown - 7 (see Table 4.5 in the draft EIS/EIR). Changes in relative percentages of landownership for the previously identified cultural resource polygons would be fairly even, with a slight increase toward public ownership of lands located in the defined polygon areas. Relative percentages of landownership for each of the polygons under this alternative are noted below in the addendum to Table 4.6 (This data should be compared with information for other alternatives in Table 4.6 of the draft EIR/EIR).

Addendum to Table 4.1

TABLE 4.1 CHANGES IN OWNERSHIP IN AREAS SUPPORTING MORE THAN 250 DESERT TORTOISE/SQUARE MILE

PUBLIC TO PRIVATE (ACRES)			PRIVATE TO PUBLIC (ACRES)			TOTAL LOSS/GAIN PUBLIC LAND (ACRES)
1	2	3	1	2	3	
3,100	0	20,800	0	640	0	- 23,260

Addendum to Table 4.2

TABLE 4.2 CHANGES IN OWNERSHIP IN AREAS SUPPORTING 100-250 DESERT TORTOISE/SQUARE MILE

PUBLIC TO PRIVATE (ACRES)				PRIVATE TO PUBLIC (ACRES)				TOTAL LOSS/GAIN PUBLIC LAND (ACRES)
4	5	6	7	4	5	6	7	
6,040	5,480	0	17,320	0	52,640	2,320	16,400	+ 42,520

Table 4. A
Net Gain or Loss of Desert Tortoise
Habitat Having Densities Greater Than 100 Desert Tortoise
Per Square Mile

Alternative	Net Gain To Public Land (acres)	Net Loss To Private Land (acres)
I	0	- 90,071
II	0	- 6,464
III	0	- 18,144
IV	0	- 25,600
V	67,776	- - -
VI	0	- 19,552
VII	19,260	- - -

Addendum to Table 4.6

TABLE 4.6 RELATIVE PERCENTAGE CHANGE IN PRIVATE/PUBLIC LANDOWNERSHIP UNDER THE DEFINED ALTERNATIVES FOR EACH OF THE BLM-IDENTIFIED CULTURAL RESOURCE POLYGONS

Polygon	% Private/Public	Polygon	% Private/Public
126	0/100	127	0/100
129	0/100	130	0/100
152	100/0	153	100/0
156	0/100	158	0/100
159	0/100	160	0/100
161	0/100	162	0/100
174A	0/100	174B	0/100
175	30/70	176	20/80
177	0/100	178	0/100
179	90/10	180	100/0
182	100/0	183	-
195	100/0	196	90/10
197	100/0		

The large size of the consolidation zone would greatly increase the potential for more effective management of cultural resource properties due to the elimination of the checkerboard landownership pattern and dispersed tracts of public land. Presently, the number of known and potential cultural resource sites in disposal zones is unknown. These resources would be protected under regulations and procedures as noted in Section 1.3 of the draft EIS/EIR.

Designation consideration of private lands within the retention zones as Rural Conservation (RCN) or Rural Living (RL) would provide protection for cultural resource properties located on these lands. There would be no change on private lands in the disposal zone where existing land use categories would continue.

Protection of these resources is based on regulations and procedures noted in Section 1.3 of the draft EIS/EIR and on the dispersed nature of development with Rural Conservation and Rural Living designations.

Recreation and Public Access

Over the long-term, access to recreation opportunities within consolidation zones would improve due to consolidation of public lands and subsequent improvement in the manageability of the resources. More restrictive regulations will apply to ORV uses in the consolidation zones that are changed from MUC Class M to MUC Class L (181,760 acres). Specifically, competitive events would be restricted under MUC Class L. These restrictions include prohibition of pit, start, finish and spectator areas, and limit ORV events to approved areas: none currently occur within the LTA Project area. Generally, in MUC Class M areas (see Figure 3.2, page 3.40, draft EIS/EIR), events may be permitted on existing routes of travel and the above restrictions do not apply. Consolidation would benefit some types of recreational uses by improving future recreational access in both MUC Class L and M areas due to reduced conflicts with private landowners. Also under Alternative VII, additional lands would be within the retention zone when compared to previously preferred Alternative VI. This, in effect, continues Class M in 70,965 acres within the LTA Project area, allowing more vehicle-intensive recreation.

Visual and Aesthetic Resources

Alternative VII will have a positive effect on the management of visual resources in the project area. The greater the extent of contiguous public land blocks, the more positive the effect. Application of sound visual resource management techniques is best accomplished with large blocks of land under single ownership. Lands on three sides of the Rainbow Basin Area of Critical Environmental Concern (ACEC) will be consolidated into public ownership. This will be a positive benefit to the visual resource values of the ACEC.

Socioeconomic Resources

Additional lands available for development under Alternative VII are similar to those areas available under Alternatives III, IV, and VI. With the inclusion within the disposal zone of most of the area between I-15 and National Trails Highway from Barstow to Victorville, there is a greater opportunity for logical community development. Recent inquiries have been made as to the availability of some of these public lands, particularly those adjacent to I-15, because of the availability of good access by several freeway off-ramps. Development of private lands in the same area has been recently promoted. The configuration of the disposal zone would allow most efficient development of private land.

4.7.5 LAND USES AND PATTERNS

Areas of Critical Environmental Concern

Designation of Areas of Critical Environmental Concern (ACECs) sought to include all public lands necessary to protect specific ACEC values. Surrounding lands may or may not contribute additionally to ACEC values, but acquisition of intermingled private lands within the boundary generally would contribute to ACEC values.

Black Mountain ACEC would be in a consolidation zone under Alternative VII and completely surrounded by public land. Consolidation would benefit the resource values of the ACEC versus the present condition where several parcels of privately held land abut the ACEC boundaries.

Eriophyllum ACEC would be entirely within a consolidation zone under Alternative VII. Resource values would be afforded protection through consolidation of surrounding public lands.

More of the Harper Dry Lake ACEC is in a consolidation zone under Alternative VII than under Alternative VI. One boundary abuts a proposed and existing disposal zone and could potentially impact some resource values of the ACEC. Protection of the resource values of the ACEC would be facilitated by public land management on three of four boundaries of the ACEC.

Kramer Hills ACEC would be in a consolidation zone under this alternative and surrounded by significant holdings of public land. Management of this ACEC within a consolidation zone would facilitate protection of the ACEC resource values.

Rainbow Basin ACEC would be in a consolidation zone although portions of its boundaries would abut a retention zone where ownership would not change. Resource values would be subject to some degradation in areas associated with private holdings in the retention zones as with the existing situation. Overall resource values would be protected by the consolidation zone management.

Helendale ACEC would be in a specific retention zone under Alternative VII. No ACEC properties would be available for exchange. Adjacent public lands would be within the disposal zone. Private lands adjacent to the ACEC are zoned agricultural (AGR) and Rural Living (RL). The management plan for this ACEC is currently being written and will address suitable protection measures for the ACEC values.

Wilderness Study Area

Black Mountain Wilderness Study Area (WSA) is within a consolidation zone for this alternative. A consolidation zone extends several miles from the boundaries in all directions, providing protection for the resource values of the WSA. Wilderness values would not be impaired. Public land management of all lands within the WSA boundaries would enhance protection of identified wilderness values.

Western Mojave Saltbush Research Natural Area

The Western Mojave Saltbush Research Natural Area (RNA) would benefit by consolidation of public lands. The RNA would be contained within the saltbush Unusual Plant Assemblage (UPA), previously described in Section 3.3.3.1 of the draft EIS/EIR. While the UPA addresses only vegetative aspects, the RNA is a specific BLM management unit and encompasses plants, animals, and other aspects of the unique ecosystem for which it was designated. Protection of the resource values found in the RNA would be facilitated both by location within a consolidation zone and by the presence of contiguous areas of public land.

Range and Grazing Resources

Consolidation of the public and private lands would result in better grazing management. Primarily this would come through better control.

This alternative would place all of the public land in the Bissel and Double Mountain allotments in the disposal zone (e.g. available for trade to the private sector (see Table 4.15, this document). Boron sheep and Antelope Valley allotments would lose most of the public lands within allotment boundaries. Lessees that strongly depend on these public lands in their livestock operations would be detrimentally impacted. Fifty percent or more of the public land on the Oak Creek allotment would remain in the retention zone, (present management and ownership). Stoddard Mountain allotment would lose 45 percent of its public lands.

Over 50 percent of the public lands in Harper Dry Lake, Superior Valley, Gravel Hills, Goldstone, Monolith Cantil, and Buckhorn Canyon allotments would be in the consolidation zone (private land to be converted to public land). Consolidation of these public lands would present opportunities for more effective range management activities.

Grazing on private land within allotments would be determined by private landowners and county zoning ordinances.

Public land in the LTA Project area under Alternative VII would increase by about 108,100 acres and 1,441 AUMs. The Ridgecrest Resource Area would gain about 9,700 acres and lose about 637 AUMs. The Barstow Resource Area would gain about 98,300 acres and 2,078 AUMs. Private land gains or loses would be the opposite of the public land changes.

The reader is referred to Table 4.10 in the draft EIS/EIR for comparison values for other alternatives.

Most of the grazing allotments adversely affected by this alternative have Section 15 land which is based on a grazing lease requiring 2-year notices to terminate. In addition, range improvements invested in by ranchers would be purchased from the rancher at fair market value prior to completing any land exchange. The forage composition of the vegetation for livestock needs to be evaluated on those allotments in which there are large acreages in public or private ownership in consolidation or disposal zones to provide a basis for management plans (see Section 1.3). Any decision to allocate AUMs to livestock grazing when private land is acquired (except conversion of private leased AUMs to public leases or permits) would be made based on a separate environmental analysis including standard opportunities for public involvement.

The portion of the allotments proposed for consolidation has a county Rural Conservation (RC) designation under the San Bernardino County Plan. An RC designation has a maximum density of 40 acres per residence and is not anticipated to result in allotment access problems. The retention zone would be considered for a maximum density of Rural Living (RL). An RL designation allows housing development of land parcels as small as 2.5 acres, potentially obstructing or eliminating access to allotments and altering forage bases that may have been previously accessible on private lands. The disposal zone would continue under existing land use categories. (see addendum to Table 4.10 below).

Agricultural Resources

Changes in landownership and subsequent consideration for designation under county land use categories could result in impact to availability of land suitable for agricultural development within the LTA. Available water is an economic prerequisite for agricultural operations. Current overdraft of the Mojave River Aquifer has resulted in a county restriction against additional agricultural development based on water from that source if and until conflicts are resolved. Approximately 8,960 acres of public land identified for disposal would be within the San Bernardino County agricultural land use category (see Table 4.8 in the draft EIS/EIR). Agricultural uses are prohibited on public land (except livestock grazing).

TABLE 4.15 GRAZING VALUES FOR ALTERNATIVE VII

ALLOTMENT	ZONES[1]	LANDOWNERSHIP Federal acres (1000s)	State acres (1000s)	Private acres (1000s)	ANIMAL UNIT MONTHS[2] Federal AUMs	State AUMs	Private AUMs	MUC[3]	LUC[4]
Harper Dry Lake	C	12.4	-	5.1	462	-	191	L	RC
	R	-	-	-	-	-	-	-	-
	D	3.7	-	2.1	138	-	78	U	CNT
Superior Valley	C	110.7	1.9	34.8	1484	25	467	L	RC
	R	21.1	-	11.0	283	-	147	M	RL
	D	-	-	-	-	-	-	-	-
Gravel Hills	C	115.1	3.2	102.4	2698	8	2400	L	RC
	R	-	-	-	-	-	-	-	-
	D	-	-	-	-	-	-	-	-
Shadow Mountain	C	16.8	-	6.0	1176	-	422	-	RC
	R	6.6	-	2.6	460	-	187	M	RL
	D	13.1	-	3.2	921	-	223	U	CNT
Goldstone	C	2.6	-	.6	165	-	41	L	RC
	R	-	-	-	-	-	-	-	-
	D	-	-	-	-	-	-	-	-
Stoddard Mountain	C	32.4	-	6.4	340	-	238	L	RC
	R	15.8	-	3.9	165	-	40	M	RL
	D	39.5	.3	11.1	414	3	117	U	CNT
Buckhorn Canyon	C	8.7	-	1.4	477	-	74	L	RC
	R	2.0	-	.6	112	-	34	M	RL
	D	2.0	-	.6	112	-	34	U	CNT
Monolith Cantil	C	19.2	-	24.5	200	-	255	L	RC
	R	-	-	-	-	-	-	-	-
	D	-	-	2.1	-	-	22	-	CNT
Boron Sheep	C	3.4	-	3.9	47	-	22	U	RC
	R	-	-	-	-	-	-	-	-
	D	8.0	-	23.7	110	-	326	U	CNT
Bissel	C	-	-	-	-	-	-	-	-
	R	-	-	-	-	-	-	-	-
	D	4.0	-	-	308			U	CNT
Oak Creek	C	-	-	-	-	-	-	-	-
	R	0.08	-	-	8	-	-	U	CNT
	D	0.08	-	-	8	-	-	U	CNT
Warren	C	-	-	-	-	-	-	-	-
	R	0.58	-	-	55	-	-	U	CNT
	D	-	-	-	-			-	-
Antelope Valley	C	-	-	-	-	-	-	-	-
	R	.5	-	-	37	-	-	-	-
	D	6.0	-	-	492	-	-	U	CNT
Double Mountain	C	-	-	-	-	-	-	-	-
	R	-	-	-	-	-	-	-	-
	D	0.58	-	-	32	-	-	U	CNT

[1] LTA Zones: C=Consolidation Zones, R=Retention Zones, D=Disposal Zones
In the consolidation zone, private acres and AUMs would be added to BLM control. In the disposal zone, public acres and AUMs would be removed from BLM control.

[2] AUMs were calculated using the public acreage and average 5-year AUMs to determine acres per AUM for an allotment. The percentage of public land was used in each zone to calculate the acres and AUMs for each allotment. The assumption was made that private land would be grazed similarly to public land. The acres/AUM calculation for public land was used to calculate the acres and AUMs for private land within each allotment. Calculating AUMs in this manner assumes that the vegetation is similar across the allotment and that the acres/AUM can reasonably be based on 5-year AUM averages.

[3] Multiple Use Classification on Public Land
L (Limited) M (Moderate) U (Unclassified)

[4] Land Use Categories in San Bernardino County
RL (Rural Living) RC (Rural Conservation) CNT (Continued Existing Uses)

Addendum to Table 4.10*

TABLE 4.10 APPROXIMATE CHANGES TO FEDERAL ACREAGE AND AUMS ON GRAZING ALLOTMENT BY ALTERNATIVE

Allotment	Acres (1,000s)	AUM
Harper Dry Lake	1.4	53
Superior Valley	34.8	466
Gravel Hills	102.4	2400
Shadow Mountain	-7.1	-497
Goldstone	0.64	91
Stoddard Mountain	-33.1	-347
Buckhorn Canyon	-0.7	-38
Monolith Cantil	24.5	255
Boron Sheep	-4.1	-56
Bissel	-4.0	-308
Oak Creek	- 0.08	-8
Warren	0.0	0
Antelope Valley	-6.0	-488
Double Mountain	-0.58	-32
Total (Net)	108.1	1441
Ridgecrest Area (Net)	9.7	- 637
Barstow Area (Net)	98.3	2078

* These increased AUMs may or may not be allocated to livestock grazing. If private land within consolidation zones is currently leased for grazing, the same number of AUMs could be converted to the public grazing lease or permit with no net increase in grazing. No net increase in grazing would occur without separate environmental analysis and standard public participation opportunities.

Geology and Minerals

Alternative VII would result in several historic mining exploration and development areas being placed into the disposal zone. In addition to those areas identified in Alternative VI, the area near Quartzite Mountain is in a disposal zone. Land exchange would be subject to prior rights of mining claimants (see Section 1.3 in the draft EIS/EIR). This alternative would potentially eliminate three county borrow sites for road repair material.

Consolidation of public lands over areas which contain mineral resources potential would benefit the mining industry. The benefit is provided by facilitating exploration over large contiguous areas open to exploration and development under federal mining laws. Subject to valid, existing rights, which would not be taken without just compensation, disposal of scattered land parcels would eliminate some areas within the LTA Project from mining under federal mining laws.

Military Testing and Training Requirements

Military testing and training requirements would be well served by this alternative. The supersonic corridor would be in a consolidation zone as would portions of the ingress/egress corridor to George Air Force Base. The immediate area surrounding the Precision Impact Range Area (PIRA) would be in either a retention or consolidation zone, providing a high degree of protection for the resources required to complete the Air Force mission at Edwards Air Force Base. Implementing land use and noise attenuation guidelines would help to minimize the noise and accident hazards associated with military flying activities.

5. CONSULTATION AND COORDINATION

5.3 PUBLIC PARTICIPATION BETWEEN DRAFT AND FINAL EIS/EIR

Public participation during the period between issuance of the draft EIS/EIR and preparation of the final EIS/EIR was accomplished through public meetings (Victorville: September 22, 1987 and Lancaster: September 23, 1987), written responses to the draft EIS/EIR during the public comment period, and additional informal meetings with representatives of the desert tortoise interest groups, San Bernardino County Supervisor, George Air Force Base, and the Sierra Club. The objectives of the public comment period which included the public meetings and the acceptance of written response were to allow all members of the affected public to express their concerns for the record. The objectives of additional informal meetings with other specific parties were to allow specific analysis of the issues of major controversy.

Approximately 700 copies of the draft EIS/EIR were sent out for comment to the agencies and organizations listed in the draft EIS/EIR, and to individuals who requested copies.

6.1 ADDITIONS, DELETIONS AND CORRECTIONS

Table 6.1 contains the additions, deletions and corrections to the text of the draft EIS/EIR. These changes are based on comment letters and agency review of the draft EIS/EIR or address references to the new Alternative VII.

In the table below, the following conventions were used: (1). **bold type** indicates wording has been added; (2). double parenthesis ((....)) and underlining indicates the text should be deleted from the draft EIS/EIR. Paragraphs are counted from the first complete paragraph on each page of the draft EIS/EIR.

TABLE 6.1

ADDITIONS, DELETIONS AND CORRECTIONS

Page	Paragraph	Line	Change
iv	2	7	. . . Concern (ACECs),a **Research Natural Area (RNA),** and a Wilderness Study Area . . .
iv	3		Replace paragraph with: **Alternative VII includes a level of benefit to the functions of all three agencies by promoting management of contiguous areas and the resources or resource values of concern. By reclassifying and consolidating certain areas within the project area in public ownership, resource values such as habitat for desert tortoise and Mohave ground squirrel would be afforded a greater level of protection in most of their usable habitat. Certain other areas with limited manageability due to increasing intrusion of private developments would no longer be afforded management protection by BLM. This loss of habitat would adversely affect the Mohave vole although the public lands affected are only a small portion of the total available vole habitat along the Mojave River. A beneficial socioeconomic effect would accrue over time to existing community centers. Potential for expansion of mining activities in certain areas would decrease. Loss of portions of grazing allotments would occur. BLM management would help to insure that the military airspace areas in the LTA Project remain usable in the future. Residential development would occur away from the existing airspace use areas and closer to existing development and associated services, resulting in more logical development for county management and a net improvement in protection of private citizens health and safety. Conflicts between land and airspace uses would be reduced. With the exception of mining, livestock grazing, and loss of some Mohave vole habitat, there would result an overall positive benefit to the human environment.**

Page	Paragraph	Line	Change
1-1	5	7	All references to the supersonic/low level flight corridor here and elsewhere in this document should indicate a low to medium altitude supersonic corridor.
1-3	Fig. 1.1		Some unrelated land exchanges have occurred within the project area which have changed the ownership of some of the land shown on this and every other mapped figure in the draft document. Specifically, the public lands within Sections 27, 28, 32, 34 & 35, T. 9 N., R. 4 W., and Sections 3 & 4, T. 8 N., R. 4 W., SBBM are now privately owned lands. Also, all maps should reflect **"Desert Tortoise Research Natural Area".**
1-4	Fig. 1.2		Correct Title of Figure to **LTA Project - Affected Flight Areas**
1-9	4		Replace first sentence. **Parcels encumbered with unpatented mining claims will be addressed on a case by case basis. If those parcels are exchanged, the exchange will be done only after recognizing any valid existing rights the mining claimants may have.**
2-1	5	3	Add: (. . Wilderness Study Area, **Research Natural Area)** . .
2-11	2	2.4.6	Delete ((- PROPOSED ACTION))
2-11	4	2	Add: conflicts with DoD activities **and improve manageability of sensitive resource values** (see . . .
2-11	5	3,5	Add: with DoD activities **and with public land management objectives.**
2-14			Add: Description of Alternative VII printed in text of final EIS/EIR.
2-15			((Delete table 2.2)). Replace with final EIS/EIR executive summary.
3-9	3	13	Delete last sentence. Replace with: **The California State Water Resources Control Board has completed its review (June 16, 1988) of water availability in the Mojave River Basin and has concluded that there is a significant overdraft of water in the Basin.**

Page	Paragraph	Line	Change
3-9	5	4	This ((would be)) **is** amplified by.
3-10	1		**Information based on data and interviews with agency personnel conducted by contractor during 1986 (USDI-BLM, 1980b, Barto, et.al., 1986)**
3-10	4	5	Replace last sentence. **Fremont and Buckthorn washes are associated with floodplains.**
3-10	6	5	Replace ((environmental documents)) with **tiered analyses.**
3-15	4	2	Replace ((and have been sighted or reside in)) with **and potential habitat is available within the study area.**
3-15	5	7	Add: . . for bald eagle, **although there have been no documented occurrences here.**
3-17	2	4	Add new sentence to end of paragraph: **(Figure 3.2 is based on data available in 1978. No more recent data on tortoise densities area wide is available.)**
3-17	3	1	Add to beginning of first sentence: **Throughout its entire range,** desert tortoise consume green annuals . .
3-17	4		Add at end of paragraph: **(Opuntia treleasei does not occur within the boundaries of the LTA project area.)**
3-18	3	4	Delete: . .valleys; ((an)) elevations. .
3-19	Fig. 3.2		In Map legend, 1-7 Map reference numbers should refer to Tables 4.1 and 4.2. The designation of crucial tortoise habitat should indicate an area for development of a desert tortoise habitat management plan.
3-23	4		Add new paragraph to follow paragraph 4: **The special nature of this unusual plant assemblage and the ecosystem to which it belongs was recognized in the California Desert Conservation Area Plan (1980) which designated a Western Mojave Saltbush Research Natural Area (RNA) of**

Page	Paragraph	Line	Change
			approximately a square township in size. (See 3.5.1.7 in the Final EIS/EIR.)
3-24	1	5	Add to end of last sentence: **and includes species present in or near the LTA project area.**
3-39	Fig. 3.3		The noise contours for George AFB are currently being revised.
3-39	Fig. 3.3		Add to Note in legend: **The contours as depicted over the Supersonic corridor are projected supersonic noise contours only.**
3-43	4		See new section 3.5.1.7 printed in text of final EIS/EIR.
3-53	Figure 3.7		The legend title of this figure should read: **Barstow R. A. and Ridgecrest R. A. Grazing Allotment Legend.** The map of livestock grazing allotments is unclear. Allotment #2 only contains those public lands in Sec. 24, T. 11 N., R. 15 E., SBBM and allotment #3 only contains those public lands within Sec. 22, T. 11 N., R. 14 E., SBBM. Allotment 1 contains the remainder of the highlighted sections to the south of allotments #s 2 and 3. Allotment labeled as 11 should be Number 12. The Buckhorn Canyon Allotment (No. 11) is located in the following townships, ranges and sections on the Victorville, California quadrangle map: T.8N., R.5W. Sec. 14, 23, 24, 26-35 and T.7N., R.5W. Sec. 2-6, 8, 10-15 and parts of 22, 23, 26, and 35.
3-58	4		Add New Paragraph: **Under the 1872 Mining Law, citizens have the right to enter the public lands and prospect for, extract, sell, and patent the locatable minerals. On private land, this right does not exist; therefore, the miner/ operator is subject to the owners permission and normally, royalty payments before minerals can be removed. The same would apply to leasable minerals such as oil or gas and salable minerals such as sand and gravel unless**

Page	Paragraph	Line	Change
			these minerals were reserved to the U.S.
3-58	6	4	Add new sentence: **Other sources include Kramer Hills, Goldstone, and Quartzite Mountain.**
3-58	7	4	Add new sentence: **Other explorations occur area wide.**
3-59	2		Insert new paragraph following para. 3: **Also within the project area, the State of California Transportation Department (Cal-Trans) operates two materials pits on public lands.**
3-59	6	3	Add to end of paragraph: **The relative value of wind energy is dependent on price and availability of alternative energy sources such as petroleum products. Recent declines in the price of oil have resulted in decreased interest in new wind energy development at this time (1988).**
3-60	3		Delete paragraph 3. **There is no current, existing problem with known powerline towers and the existing flight uses.**
4-1	1	1	Change first sentence to read: ...pages **describe the effects that would occur with full implementation of each of the alternatives.**
4-1	1	2	Add a second and third sentence to para: **The level of actual implementation will be dependent on the number of voluntary exchange transactions that occur (for Alts. II- VII) or exchange or sale transactions that occur within existing disposal zones (Alt. I). It is anticipated that levels of actual impacts would be less than discussed in this chapter because 100 percent implementation is unlikely to occur. The 100 percent analysis is offered, however, as a full disclosure of potential impacts.**
4-1	2		Add: **No wild and scenic rivers or prime and unique farmlands are present in or near the project area and thus would not be affected by the project.**

Page	Paragraph	Line	Change
4-1	2		To assist in analysis of the potential impacts of any of the alternatives discussed, use the following information to guide you throughout this chapter. Add new paragraph to follow paragraph 2: **To aid in disclosure of cumulative impacts and comparison of the No Action alternative (I) to the other alternatives (II-VII), the following environmental consequences currently affect the project area. These impacts include: regional declining air quality both in terms of particulate matter and toxins. Regional depletion of existing water sources for surface and groundwater. Regional increases in socioeconomic values as local communities are affected by substantial growth. Wildlife habitat is being adversely affected regionwide by growth of communities and development on private lands. Specific to desert tortoise populations and habitats, a substantial decline in both has occurred in the last ten years due to multiple causes. Conversely, additional desert tortoise habitat protection measures have been implemented northwest of the project area through management of the desert tortoise RNA. Development of the LUZ International solar facility near Boron destroyed habitat for the desert tortoise/Mohave ground squirrel/Barstow woolly sunflower. Mitigation in the form of replacement habitat and requisite habitat management is underway to counter these impacts.** **The following discussion of impacts discloses environmental consequences specific to each alternative.**
4-1	4		Delete ((air resources, ground and surface water resources)).
4-1	4		Add to paragraph, at end: ...WSA **Existing regional occupancy and growth would continue to affect regional air quality and continue to place extra demands on the Mojave River aquifer.**

Page	Paragraph	Line	Change
4-1	5		Add section for: **Air and Water Quality: Some development of private lands would occur within the project area under the no action alternative (and under any of the other alternatives discussed). Development of these private lands would increase demands on the finite water supply of the region and, depending on the types of development, could also impact air quality to a slight degree. Impacts to water quality or quantity or to air quality from the No Action alternative are not anticipated to be significant.**
4-2	1	6	Insert at end of first para: ... 3.3.2). **In most cases, the development of private land increases the adverse impact of human activities to wildlife habitat on adjacent public lands. Occasionally, the intermingled land pattern effectively excludes development of private land, creating a larger habitat area effectively under management. Interest in private development of intermingled lands in the Western Mojave Desert has been increasing.**
4-2	3	20	. . .presently uncontrolled **except by existing county zoning which may be subject to change.** Continuation. . .
4-3	Tables 4.1 and 4.2		Footnoted acreage figures for areas 1-7 should read as follows: Total Acres Public/Private. 1 - 39,241 3,100/36,141. 2 - 5,985 5,345/640 3 - 48,263 23,863/24,400. 4 - 43,921 5,840/38,081. 5 - 125,342 58,382/66,960. 6 - 29,750 21,790/7,960. 7. 107,962 62,122/45,840.
4-5	1		The Mojave Saltbush Unusual Plant Assemblage ((will)) **would not be directly** affected by this alternative. **However, the 497,800 acres located within the project area occurs over the checkerboard land pattern and could be adversely impacted if development of private land occurs.**
4-6	Table 4.4		Data for Alternative VII is presented in Section 4.7.3 of this document.

Page	Paragraph	Line	Change
			Comparisons should be made between that data and the data for other alternatives presented in Table 4.4 of the draft.
4-6	Table 4.5		Data for Alternative VII is presented in Section 4.7.4 of this document. Comparisons should be made between that data and the data for other alternatives presented in Table 4.5 of the draft.
4-7	Table 4.6		Data for Alternative VII is presented in Section 4.7.4 of this document. Comparisons should be made between that data and the data for other alternatives presented in Table 4.6 of the draft.
4-9	1	4	. . . is not ((possible)) as **easily achievable where public and private lands are interspersed.** Delete remainder of sentence.
4-9	1	6	Instead, sporadic growth ((patterns are encouraged)) **occurs.**
4-9	3		Add section: **Western Mojave Saltbush Research Natural Area: Lands important to the efficient management of this RNA which are currently in private ownership would not be consolidated under public management under this alternative.**
4-16	6	3	... on the Gravel Hills, **Goldstone, and...**
4-16	6	5	... on the Superior Valley, **Shadow Mountain, Stoddard Mountain and Boron allotments...**
4-16	6	6	((reminder)) should be: **remainder** would be unclassified ...
4-17	Table 4.9		Under the Gravel Hills Allotment for State acres add **1.3 acres** in consolidation, and **1.9 acres** in the retention zone. For State AUMs: add **3.0** in consolidation and **4.5** in retention. Delete ((RL and L)) designations from the MUC and LUC columns.
4-18	Table 4.10		For comparison purposes, the numbers presented under Alternative I should be considered to be a reflection of

Page	Paragraph	Line	Change
			existing conditions. Alternatives with (+) or (-) values should be read as increases or decreases above or below existing conditions.
4-27	Table 4.11		Under the Gravel Hills allotment, State AUMs should be 61 for consolidation and 15 for retention. The question marks (?) under private landownership for the Bissel allotment and the remainder of the allotments should be dashes (-).
4-35	Table 4.12		Under the Stoddard Mountain allotment, the state acreage should be .3 and the state AUMs should be 3.
4-41	Table 4.13		Under the Gravel Hills allotment, state AUMs should be 75. Under the Stoddard Mountain allotment, state acreage should be .3 and AUMs should be 3.
4-49	Table 4.14		Under the Stoddard Mountain allotment, state acres should be .3 and AUMs should be 3 for retention zones. Under Buckhorn Canyon allotment, the LUC for consolidation should be RC and for disposal CNT.
4-52	2		Add:**Fragmented areas of habitat do not serve the best interests of the desert tortoise. Large contiguous acreages are most beneficial for tortoise management.**
5-9	7		Add to list of contributors for the Bureau of Land Management: **Karla K.H. Swanson - Barstow Resource Area.** Add to list of contributors for the Air Force: **Robert Johnstone, Edwards Air Force Base.**
B-2			**Barto, R., V. Harris, S. Heule, G. Moss, T.Doson, and J. Moss, 1986. Ground Water Study for the Newberry Springs Area: Agreement No. 80-67. Ron Barto and Association for San Bernardino County. 100 pp.**

7.0 INTRODUCTION

This section is divided into two parts: (1) comments summarized from the two public meetings, and (2) comment letters and responses.

The responses to comments fall into three general categories. Some comments required a clarification of the information in the draft EIS/EIR. These are found in the response to the individual comment. Other responses required minor changes in the text of the draft EIS/EIR. These changes are found in the Additions, Corrections and Deletions. Still other changes resulted in the final project proposal. These changes are found under Alternative VII in Chapter 2 of this final EIS/EIR.

7.1 SUMMARY OF COMMENTS FROM PUBLIC MEETINGS

Two public meetings were held for the purpose of obtaining specific comments on the draft EIS/EIR. A public meeting was held in Victorville, California, on September 22, 1987. Approximately 15 people attended. Three (3) persons registered to present comments at this public input session. Mr. George Byers, representing Southern Pacific Land Company and Santa Fe Pacific Minerals Corporation spoke regarding land exchanges and the lack of sufficient land base to accomplish all exchanges now being contemplated in the California Desert. A copy of Mr. Byers comments were also submitted in a comment letter, see letter and response No. 4 which follows. Mr. Leon Keding, a planning consultant spoke on the length of time the LTA project has been active. Mr. Keding expressed concern regarding the length of time necessary to complete all of the legal requirements for the LTA so that land can actually be exchanged but had no comments on the environmental analysis. Mr. Billy Mitchell, a cattleman in the area, spoke regarding land exchanges and the effect they may have on established landowners but also had no comment on the environmental document. A second public meeting was held in Lancaster, California on September 23, 1987. This meeting was attended by approximately 35 people. No official comments on the draft EIS/EIR were received at this meeting: only informal questions and answers on the nature of the proposal were heard. Transcripts of these meetings are available at the BLM Barstow Resource Area office.

7.2 COMMENT LETTERS

Comment letters were received from 25 individuals and organizations (Table 7.1). Each letter was assigned a reference number (1-25) for use in responding to comments (Table 7.2). Each letter was divided into its major points and each point was assigned a number. Each comment will be referenced by a two number code. The first number refers to the letter; the second number refers to the point within the letter (e.g., 10-3).

TABLE 7.1
LIST OF COMMENTORS

Assigned Number (in order of receipt)	Commentor
1	Fred Sabatino
2	Kern County/Randall Abbott
3	San Bernardino County/Robert Corchero
4	Southern Pacific/Santa Fe Minerals/George Beyers
5	U.S.D.I./Bureau of Mines
6	State of California/Governor's Office
7	State of California/ Resource Agency
8	State of California/Department of Fish and Game
9	City of Los Angles/Department of Water and Power
10	Desert Tortoise Preserve Committee, Inc.
11	City of California City
12	Ronald A. Henry
13	Friends of the Trail/Jerry Counts
14	California Native Plant Society
15	Sierra Club, San Diego Chapter
16	U.S. Borax/William Pennell
17	California Native Plant Society, Bristlecone Chapter
18	U.S. Fish and Wildlife Service
19	Desert Tortoise Council/Dr. Glenn Stewart
20	Desert Tortoise Preserve Committee/George Moncsko
21	Mary Ann Henry
22	Southern California Edison/D.L. Miller
23	Defenders of Wildlife/Richard Spotts
24	Department of the Army/Corps of Engineers
25	U.S. Environmental Protection Agency

COMMENT LETTERS AND RESPONSES

TABLE 7.2

RECEIVED
BUREAU OF LAND MANAGEMENT
1987 AUG 27 AM 11: 19
BARSTOW RESOURCE AREA
BARSTOW, CA.

Aug 24, 1987

Dear Sirs,

1.1 After reviewing the Western Mojave LTA Project Draft, it seems only logical that alternative VI be put into effect. Whereas each alternative would be detrimental to the fauna and flora of the areas as well as "eminent domain" exercised by each of the agencies involved, the approval of alternative VI is the only answer.

1.2

F. SABATINO
44 VAN HOUTEN PL.
BELLEVILLE, NJ 07109

New address

Thank you!
Fred Sabatino

Letter 1 - Sabatino

1.1 Consolidation of public lands under each alternative could benefit flora and fauna; while disposal of public lands could be detrimental. Alternative VII, the final proposal, was developed to provide the best balance between disposal and consolidation and still meet the objectives of the project.

1.2 The project would be implemented through voluntary land exchanges between private landowners and the Bureau of Land Management. Therefore, the condemnation procedures associated with "eminent domain" are not applicable to this proposal.

DEPARTMENT OF PLANNING AND DEVELOPMENT SERVICES

RANDALL L. ABBOTT
DIRECTOR
STEVEN G. LADD
Assistant Director

Mailing: 1415 Truxtun Avenue
Bakersfield, CA 93301
Location: 1356 Norris Road
Bakersfield, CA 93308

(805) 861-2615

September 1, 1987

FILE: Agency
U.S. Govt.-BLM

Bureau of Land Management
Barstow Resource Area
Attention Ms. Sue Richardson
150 Coolwater Lane
Barstow, CA 92311

Re: Western Mojave Land Tenure Adjustment Project; Draft EIR/EIS

Dear Ms. Richardson:

2.1 We have reviewed the Western Mojave Land Tenure Adjustment including the alternatives proposed. Since all the project land in Kern County will be in a retention zone, we have no comments at this time.

Very truly yours,

RANDALL L. ABBOTT, Director
Planning and Development Services

By Frank Chmiel
Junior Planner

FC:cms

RECEIVED
BUREAU OF LAND MANAGEMENT
1987 SEP -5 PM 3:36
BARSTOW, CA.

Letter 2 - Abbott

2.1 Some of the public land acreage in Kern County would be subject to disposal under all alternatives including the final proposal, Alternative VII. Disposal of these isolated public land parcels can assist the orderly development of private lands.

DEPARTMENT OF TRANSPORTATION/
FLOOD CONTROL/AIRPORTS

825 East Third Street • San Bernardino, CA 92415-0835 • (714) 387-2800

COUNTY OF SAN BERNARDINO
ENVIRONMENTAL
PUBLIC WORKS AGENCY

MICHAEL G. WALKER
Director

September 3, 1987

File: 4-101/1.00
4(FED)-7

RECEIVED
1987 SEP -5 PM 3:38

Land Tenure Adjustment Project
Barstow Resource Area
Bureau of Land Management
150 Coolwater Lane
Barstow, CA 92311

Attention: Mr. Gerald E. Hillier
District Manager

Re: Zone 4, Mojave River
Western Mojave Land
Tenure Adjustment
Project

Gentlemen:

Reference is made to your Draft Environmental Impact Report/Statement on the Western Mojave Land Tenure Adjustment Project dated July 1987. The proposed project has been developed to allow a more orderly land use program between the Department of Defense, Bureau of Land Management and the County of San Bernardino. The land use program basically identifies a voluntary land exchange arrangement between private property owner holdings located north and east of Edwards and north of George Air Force Bases, and Bureau of Land Management holdings in the Barstow-Helendale area. The land exchanges would be an attempt to mutually satisfy the areas of interest and concerns of the three governmental entities.

3.1 Cursory review of the project showing six proposals with proposal number six being the recommended alternative indicates that there are Bureau of Land Management holdings in the Public Land Disposal Zone that are located in the Mojave River floodway and flood plain. It is suggested that prior to the consummation of any land exchanges, the Mojave River floodway and flood plain be identified. Private individuals or corporate holdings should be made aware of the existing or potential flood hazards. The

3.2 subject of land exclusion from the Public Land Disposal Zone may be adequately met in land use zoning, but the granting of right-of-way over the floodway necessary for future channel improvements to an appropriate governmental agency would eliminate the future problems inherent in renegotiating a required dedication at the time of development. Also the Freemont and Buckthorn Wash flood plains should be identified.

Letter 3 - San Bernardino County - Corchero

3.1 This document is the first tier in a multi-tier environmental review process. Prior to any actual exchanges of private and public lands, detailed parcel evaluations would be completed. Designation of floodway and floodplain areas included in an exchange would be noted during this evaluation and the information conveyed to each party.

3.2 Second tier evaluation could include identification of potential rights-of-way for county public works requirements, including those concerning floodways and floodplains. Coordination between the Bureau of Land Management and San Bernardino County would continue throughout the exchange implementation process.

Should you have any further questions concerning this matter, please feel free to contact the undersigned at (714) 387-2515.

Very truly yours,

Robert Corchero

ROBERT W. CORCHERO, Chief
Water Resources Division

RWC:HWS:mjs

cc: Ken Williams
Planning Office (North Desert Team)

LTA

Santa Fe Pacific Minerals Corporation

6200 Uptown Blvd. N.E., Suite 400
Box 27019
Albuquerque, New Mexico 87125
505/881-3050

RECEIVED
BUREAU OF LAND MANAGEMENT
1987 SEP 28 PM 12: 42
BARSTOW RESOURCE AREA
BARSTOW, CA.

September 24, 1987

Ms. Sue Richardson
Barstow Resource Area
Bureau of Land Management
150 Coolwater Lane
Barstow, California 92311

Dear Ms. Richardson:

I enjoyed meeting and talking with you and Alden Sievers in Victorville last night. I am enclosing a copy of the statement I delivered orally on behalf of Santa Fe Pacific Minerals Corporation and the Southern Pacific Land Company.

7-8

4.0

As the statement indicates, we are extremely concerned about the multitude of ongoing and proposed federal actions in the California Desert which will directly affect our lands. We believe the Draft EIS should give a realistic assessment of the likelihood of massive exchanges, given the fact that the base of available federal lands from which exchanges can be made is shrinking within California. We also believe that the EIS requires a statement regarding the compatibility of mining and military activities in the western Mojave. And finally, there should be an assessment of the possibility of land exchanges by our company into the proposed consolidation areas outlined in the Draft EIS which are made necessary by other federal actions elsewhere in the desert.

Thank you for the opportunity to comment.

Very truly yours,

George G. Byers
Director-Public Affairs

GGB:gem
Enclosure

cc: Bill Ehri - w/encl
Santa Fe Pacific Realty Corp.

R. D. Johnstone - w/encl
Chief, Plans & Policies Division
Air Force Flight Test Center
Edwards AFB, California

EIS/EIR

Letter 4 - Santa Fe Pacific Minerals Corporation - Byers

4.0 Responses to specific comments in the body of the letter follow.

STATEMENT OF SANTA FE PACIFIC MINERALS CORPORATION
AND
SOUTHERN PACIFIC LAND COMPANY
At the Western Mojave Land Tenure Adjustment Project
Public Meeting
September 22, 1987
Victorville, California

Santa Fe Pacific Minerals Corporation, on behalf of itself and the Southern Pacific Land Company, is pleased to submit the following comments with regard to the Draft Environmental Impact Statement on the Western Mojave Land Tenure Adjustment Project. Santa Fe Pacific manages the mineral estates in the California Desert which are owned by our affiliate company, the Southern Pacific Land Company. In the area encompassed by this Draft EIS, we own some 131,000 acres of fee lands and some 5,000 acres of severed mineral estates. A map is enclosed showing the relationship of these lands with respect to the Proposed Action.

The Draft Plan states that adjustments in land ownership "would be accomplished through voluntary land exchanges between BLM and private land owners ..." If called on, we will strive to work with BLM in order to conduct exchanges, to the extent possible. However, as our personnel assess the mineral potential of our Company's lands, we may conclude that it is not feasible or wise for us to exchange in some cases.

We have recently made a similar pledge to the BLM with regard to its Draft Management Plan for the East Mojave National Scenic Area. However, we have a serious question as to whether BLM has sufficient unencumbered acres in California of similar resource character which can be offered to Santa Fe Pacific to exchange for some of our lands in the East Mojave National Scenic Area. One reason for this concern is that some of the federal lands which we had been tentatively considering for selection are

4.1

4.1 The LTA Project has identified a land disposal base within the project area, where "unclassified" public lands would be available for exchange. Boundaries of the project were developed specifically to reduce conflicts with other land tenure adjustment projects in the California Desert. Barstow Resource Area is not aware that you have selected lands within the proposed consolidation zone for the LTA Project for another exchange project. A decision to consolidate and retain portions of the LTA Project area, and manage them under "M" and "L" classifications would preclude their disposal via exchange. Generally, only "unclassified" public lands are available for disposal.

listed as lands which BLM plans to retain and consolidate under the proposed action discussed for the Western Mojave Land Tenure Adjustment Project.

Our Company thus finds itself in a perplexing box where our attempts to accommodate one BLM initiative are potentially thwarted by another. In other words, we do not believe the generalized and sweeping language with regard to land exchanges in either the Draft EIS for the East Mojave National Scenic Area or the Western Mojave Land Tenure Adjust Project provides a detailed analysis of the two alternatives of acquiring or not acquiring the private land and mineral interests which are proposed for acquisition in each Draft EIS. We believe this EIS should include at least an analysis of the availability of other BLM lands for exchange, the costs associated with such exchanges, and the cost of direct purchase if exchanges are not feasible.

4.1

4.2

In addition, Santa Fe Pacific believes that this EIS should make a finding that mining activities are not incompatible with the military purposes which seem to be the main push behind this land tenure adjustment project. In northwestern New Mexico, coal mining, uranium mining, and oil and gas production activities are conducted without disruption every day in an area used by the Air Force for low level overflights.

4.3

Finally, we believe the mineral potential of the Western Mojave Desert has been substantially understated in this Draft EIS. To quote BLM's Newsbeat (September 1987), "the California Desert is one of the most diverse geologic and mineralized regions in the world... The desert is also thought to hold vast undiscovered mineral deposits, as well as deposits that remain undeveloped today only for economic or technologic reasons."

4.4

4.2 Because each exchange proposal will have its own specific costs based on parcel size and value, exchange costs will be determined on a case by case basis. The private landowner will be informed of these costs at the outset of each exchange agreement. Direct purchase of private lands is not a part of the LTA Project proposal under any alternative.

4.3 Mining activities would not necessarily conflict with use of Air Force airspace corridors. Specific activities that could cause conflicts would be those that generate large quantities of dust, or that utilize very tall structures, such as those more than 100 feet tall. Many times conflicts can be avoided through careful coordination between mining companies and agencies.

4.4 See Additions, Corrections, and Deletions, Table 6.1.

In summary, our Company cannot support the proposed action without a more detailed analysis of the availability of other BLM lands in California for exchange, of the interrelationships between exchanges made necessary by BLM wilderness proposals and other land consolidation actions in the California Desert including the East Mojave National Scenic Area, and of the interrelationships with exchanges which may be made necessary by the rumored 200,000 acre southward expansion of the Fort Irwin Military Reservation. 4.5

Thank you for this opportunity to comment.

4.5 The CDCA Plan and amendments have identified lands available for disposal through exchange as "unclassified lands." Most BLM involvement in land exchanges is based on project centered scenarios. The LTA Project is an example of a very large scale exchange project. The definition of a specific disposal base for the project is one step towards better central management of exchange projects. However, BLM regulations contain wording that allows each exchange proposal to be judged on its own merits. We are not aware that a proposal by the Department of the Army to expand Fort Irwin National Training Center will include land exchanges.

United States Department of the Interior

BUREAU OF MINES
WESTERN FIELD OPERATIONS CENTER
EAST 360 3RD AVENUE
SPOKANE, WASHINGTON 99202

RECEIVED
BUREAU OF LAND MANAGEMENT
1987 OCT -5 AM 11: 21
BARSTOW RESOURCE AREA
BARSTOW, CA.

October 1, 1987

Memorandum

To: Barstow Resource Area, Bureau of Land Management, Barstow, California
Attention: Land Tenure Adjustment Project

From: Supervisor, Mineral Issues Involvement Section, Branch of Engineering Studies

Subject: Draft Environmental Impact Statement/Report (EIS/EIR) for the Western Mojave Land Tenure Adjustment Project, California

5.0

Our review of the Western Mojave Land Tenure Adjustment (LTA) Project draft EIS/EIR shows the document to be adequate. Since this exchange is voluntary and mineral rights are not going to be withdrawn, we concur with both the proposed alternative and the determination that the LTA project will have potential for a small adverse effect on minerals, while also having a larger potential to beneficially affect minerals (page 4-51, paragraphs 1 and 2).

However, since the current regulations (43 CFR 2200) for land exchanges require a mineral potential evaluation, would you please send us a copy of those reports to augment our files on mineral properties.

Thank you for allowing us to review and comment on this document.

D'Arcy P. Banister

Letter 5 - Bureau of Mines - Banister

5.0 Thank you for your comments. We would be pleased to send copies of mineral potential reports to your office as they become available.

GEORGE DEUKMEJIAN
GOVERNOR

State of California
GOVERNOR'S OFFICE
OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO 95814
916/323-7480

RECEIVED
BUREAU OF LAND MANAGEMENT
1987 OCT -5 AM 11: 15
BARSTOW RESOURCE AREA
BARSTOW, CA.

DATE: October 1, 1987

TO: Ms. Sue Richardson
Bureau of Land Management
150 Coolwater Lane
Barstow, CA 92311

FROM: Office of Planning and Research
State Clearinghouse

RE: SCH 87081703---Draft EIS/EIR, Western Mojave Land Tenure Adjustment, Kern/Los Angeles/San Bernardino Counties.

6.0 As the designated California Single Point of Contact, pursuant to Executive Order 12372, the Office of Planning and Research transmits attached comments as the State Process Recommendation.

This recommendation is a consensus; no opposing comments have been received. Initiation of the "accommodate or explain" response by your agency is, therefore, in effect.

Sincerely,

Huston T. Carlyle, Jr.
Director, Office of Planning and Research

Attachment

cc: Applicant

Letter 6 - California State Clearinghouse - Carlyle

6.0 Responses to comment letters 7 (California Department of Transportation) and 8 (California Department of Fish and Game) follow.

Resources Building
1416 Ninth Street
95814

(916) 445-5656

Department of Conservation
Department of Fish and Game
Department of Forestry
Department of Boating and Waterways
Department of Parks and Recreation
Department of Water Resources

GEORGE DEUKMEJIAN
GOVERNOR OF
CALIFORNIA

THE RESOURCES AGENCY OF CALIFORNIA
SACRAMENTO, CALIFORNIA

Air Resources Board
California Coastal Commission
California Conservation Corps
Colorado River Board
Energy Resources Conservation and Development Commission
Regional Water Quality Control Boards
San Francisco Bay Conservation and Development Commission
Solid Waste Management Board
State Coastal Conservancy
State Lands Commission
State Reclamation Board
State Water Resources Control Board

Ms. Sue Richardson
Bureau of Land Management
150 Coolwater Lane
Barstow, CA 92311

October 1, 1987

Dear Ms. Richardson:

The State has reviewed the Draft EIS/EIR, Western Mojave Land Tenure Adjustment Project, Kern/Los Angeles/San Bernardino Counties. Review was coordinated with the Air Resources Board, Regional Water Quality Control Board, Solid Waste Management Board, and the Departments of Conservation, Fish and Game, Parks and Recreation, Transportation, and Water Resources.

Attached are comments that the Department of Fish and Game has provided.

7.1 The Department of Transportation (Caltrans) comments that the availability of local material sites is essential for highway maintenance. Attached is a list of Barstow area material sites that the project could affect.

7.2 Caltrans urges early consultation on proposed plans that could affect State highways and would appreciate receiving a final document as soon as it is available. Contact person is Morgan Choate at (619) 383-4233.

Thank you for providing an opportunity to review this document.

Sincerely,

for Gordon F. Snow, Ph.D
Assistant Secretary for Resources

Attachments (2)

cc: Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

(SCH 87081703)

Letter 7 - California Department of Transportation - Snow

7.1 Your list shows that three sites occur on public lands within the project area: SR58-PM9.9, SR58-31.4, and US395-PM51.9. None of these would be affected by the final proposal (Alternative VII) because each are within retention or consolidation areas.

In addition, the State of California has lands that occur within the consolidation zones. The State of California may wish to exchange for public lands within the disposal zone that could have additional potential for materials sites.

7.2 Thank you for designating a contact person.

State of California — The Resources Agency

Memorandum

To : Honorable Gordon K. Van Vleck
Secretary for Resources
1416 Ninth Street
Sacramento, CA 95814

Attn: Gordon F. Snow, Ph.D.
Projects Coordinator

Date : September 25, 1987

From : Department of Fish and Game

Subject: Draft Environmental Impact Statement/Report (EIS/EIR): Western Mojave Land Tenure Adjustment (LTA) Project, Los Angeles, Kern, and San Bernardino County, U.S. Bureau of Land Management - SCH 87081703

Department of Fish and Game (Department) biologists familiar with the project site have reviewed the Draft EIS/EIR for the LTA that discusses the joint planning effort of the Bureau of Land Management (BLM), County of San Bernardino, and the Department of Defense (Air Force) to reach agreement regarding BLM's objective to consolidate its checkerboard land ownership pattern within the 2.8 million acres of the LTA area. The document describes five alternatives designed to guide the long-term land ownership. The document also contains proposed agency land use guidelines for use within the project area. We have the following comments:

8.1 The Department does not agree with the Preferred Action, Alternative VI, because its implementation could result in adverse impacts to desert resources, particularly the desert tortoise and the threatened Mohave ground squirrel. Alternative VI would allow much of the BLM parcels to be transferred into private ownership, and could result in development of these parcels and a loss of habitat for these species. Additionally, Alternative VI would result in the loss of 1,657 acres of the Fremont-Stoddard Desert Tortoise Crucial Habitat Area. This loss is unacceptable to the Department. Recent studies show an alarming decline in tortoise populations throughout their range and particularly in the western Mojave Desert. Loss of the high density tortoise areas and the Crucial Habitat Area would result in accelerating the rate of decline of the desert tortoise population in California.

To avoid potential impacts to desert wildlife as described in the document, the Department recommends a modification of Alternative VI that would place the tortoise population areas located north, northwest, and southwest of Barstow, and habitat for the threatened Mohave ground squirrel, in Retention Zones.

Letter 8 - California Department of Fish and Game - Bontadelli

8.1 As a result of comments received on the draft EIS/EIR, and in consultation with wildlife experts, including a representative of the California Department of Fish and Game, the final proposal (Alternative VII) has been developed. For a detailed presentation of this alternative, see chapters 2 and 4 in the final EIS/EIR.

Thank you for the opportunity to review and comment on this project. If you have any questions, please contact Fred Worthley, Regional Manager of Region 5, at 245 W. Broadway, Suite 350, Long Beach, CA 90802-4467 or by telephone at (213) 590-5113.

Pete Bontadelli
Acting Director

Department of Water and Power the City of Los Angeles

RECEIVED
BUREAU OF LAND MANAGEMENT
1987 OCT -8 PM 2:12
BARSTOW RESOURCE AREA

TOM BRADLEY
Mayor

Commission
RICK J. CARUSO, *President*
JACK W. LEENEY, *Vice President*
ANGEL M. ECHEVARRIA
CAROL WHEELER
WALTER A. ZELMAN
JUDITH K. DAVISON, *Secretary*

PAUL H. LANE, *General Manager and Chief Engineer*
NORMAN E. NICHOLS, *Assistant General Manager - Power*
DUANE L. GEORGESON, *Assistant General Manager - Water*
DANIEL W. WATERS, *Assistant General Manager - External Affairs*
NORMAN J. POWERS, *Chief Financial Officer*

October 5, 1987

Mr. Alden Sievers
Area Manager
Bureau of Land Management
Barstow Resource Area
150 Coolwater Lane
Barstow, California 92311

Dear Mr. Sievers:

Western Mojave Land Tenure Adjustment Project
Draft Environmental Impact Statement/Report

Personnel from my staff have attended your public hearings and have reviewed the Western Mojave Land Tenure Adjustment Project Draft Environmental Impact Statement/Report (Draft EIS/EIR) and have prepared the following comments.

9.1 The proposed expansion of the Precision Impact Range Area (PIRA) northwest of Adelanto, California, will overlap Utility Corridor P of the California Desert Conservation Area Plan. This utility corridor, paralleling U.S. Highway 395, contains two existing sets of electric transmission line towers and will contain one new transmission line which is proposed for construction. The Los Angeles Department of Water and Power (DWP) is concerned that the PIRA expansion will create a hazardous environment for aircraft and transmission lines within the overlapped utility corridor. We request that the eastern boundary of this proposed PIRA expansion be offset from U.S. Highway 395 by approximately one mile in order to eliminate this overlap. This offset would be consistent with the U.S. Highway 395 offset shown for the El Mirage Study Area.

9.2 The DWP also has concerns with the supersonic/low-level flight corridor (Supersonic Corridor) within the R2515 Restricted Air Space associated with Edwards Air Force Base. This Supersonic Corridor is "intended to provide an adequate area of unobstructed airspace in which military testing and training exercises can be conducted safely." Although the DWP presently does not have any facilities crossing the Supersonic Corridor, a potential route for electrical transmission paralleling Southern California Edison Company's Inyokern-Kramer Transmission Line along U.S. Highway 395 is overlapped by this Supersonic Corridor. We are concerned that future transmission facilities not be precluded in this vicinity.

111 North Hope Street, Los Angeles, California | *Mailing address:* Box 111, Los Angeles 90051

Letter 9 - Los Angeles Department of Water and Power - Karapetian

9.1 The objective to consolidate public land surrounding the Precision Impact Range Area is purely a safety area extension to help prevent high density residential development adjacent to hazardous test operations. No adverse impacts have occurred to the existing transmission line towers, and none are anticipated to occur with consolidation of these public lands that will remain under management of the BLM. The El Mirage Study Area is not considered a part of the LTA Project.

9.2 A Department of Water and Power transmission line paralleling the Southern California Edison route along U.S. 395 would not be precluded by this effort. The BLM and the Air Force encourage the consolidation of transmission lines in established corridors whenever possible. Unless the proposed DWP lines are exceptionally high (more than 120 feet), there should not be a problem. Conflicts can be avoided through close coordination between companies and agencies at project outset.

9.3 Finally, the DWP would be interested in either purchasing or exchanging for federal lands which are identified for disposal, principally federal lands underlying the Boulder Transmission Lines northeast of Victorville.

We appreciate the opportunity to comment on the Draft EIS/EIR. We also appreciate the courtesy extended by your personnel to DWP representatives who attended the public hearings and meetings over the last several months. We are available to meet with you at your convenience for further discussion concerning these issues. Should you have any questions or require additional information, please contact me at (213) 481-3250 or Mr. James P. Mieding at (213) 481-8637.

Sincerely,

Edward Karapetian

EDWARD KARAPETIAN
Engineer of Environmental and
Governmental Affairs

cc: Ms. Sue Richardson
Bureau of Land Management
Barstow Resource Area

Mr. Gerald E. Hillier
District Manager
Bureau of Land Management
California Desert District
1659 Spruce Street
Riverside, California 92507

Mr. James P. Mieding

9.3 The LTA Project does not contain any area east of I-15 or northeast of Victorville. You may wish to contact the Barstow Resource Area office to determine if other "unclassified lands" are available for other exchange projects.

RECEIVED
BUREAU OF LAND MANAGEMENT
1987 OCT 13 AM 11:24
BARSTOW RESOURCE AREA
BARSTOW, CA

DESERT TORTOISE PRESERVE COMMITTEE, INC.

P.O. Box 307
Boron, CA 93516

P.O. BOX 453
RIDGECREST, CALIF. 93555

October 9, 1987

Comments on: LTA Project Draft EIR/EIS

Submitted by: Betty Forgey, Member Desert Tortoise Preserve Comm. Inc.

Recognizing that National Defense and the Air Force will be ensured of having airspace corridors; there is little the public can do but accept the alternative that best suits military testing and training requirements.

Alternative V provides suitable protection, but according to opinions expressed in the Draft, Alternative VI seems to be the preferred one.

Three conflicts that appear to be of major concern, I feel are unwarranted. Let me point out the concern shown by BLM over grazing allotments, recreation and county borrow pits:

GRAZING ALLOTMENTS

10.1 To begin with, the Mojave Desert, and in particular the area under discussion, receives approximately 5 inches of rainfall a year. Certainly soils receiving minimum amounts of rainfall are fragile. Fragile soils erode and blow away in dust storms following consumptive use. Just because we have the Taylor Grazing Act doesn't necessarily make grazing a wise use of public lands. Grazing allotments should not be a consideration...the few sheep that are allowed to desecrate the desert on an ephemeral basis each spring; we don't need! It would be more economical for permittees to truck the sheep from the Antelope Valley alfalfa fields directly to the mountains of Nevada and BLM would be protecting the public lands in the manner in which they have been mandated to do.

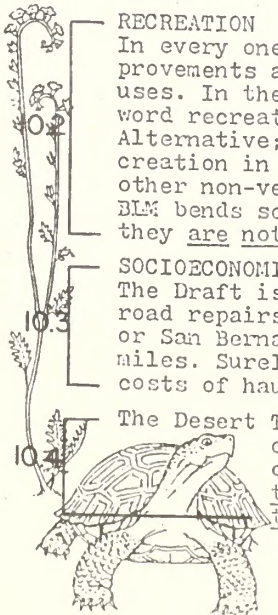
RECREATION

10.2 In every one of the Alternatives, Recreation and Public Access improvements and positive effects or restrictions are addressed to ORV uses. In the minds of BLM personnel who prepared the Draft, is the word recreation synonymous with ORV use? Obviously, yes. In only one Alternative; Alternative V (page 4-39) was any mention given to recreation in the form of "such activities as hiking, photography, and other non-vehicle oriented use". I find it very disconcerting that BLM bends so far over backwards to appease the motorcyclists when they <u>are not</u> the majority of recreationists using the desert.

SOCIOECONOMIC RESOURCES

10.3 The Draft is overly concerned for the loss of borrow sites for county road repairs. I don't think it should really worry BLM whether Kern or San Bernardino county has to haul road repair materials a few extra miles. Surely publics pay enough in gasoline and road taxes to cover costs of hauling sand.

10.4 The Desert Tortoise Preserve Committee recognizes that crucial tortoise habitat will be lost. That seems to be the unreconcilable trend anymore. <u>Alternative V will obviously protect the most tortoise habitat with the greatest densities in the Fremont-Stoddard area</u>.



Letter 10 - Desert Tortoise Preserve Committee - Forgey

10.1 Livestock grazing is an authorized use on public lands. Other resource needs, including those of vegetation and wildlife, are considered when grazing authorizations are approved.

10.2 Chapter 4 of the draft EIS/EIR contains an analysis of impacts of the LTA Project on other uses in the desert. Such uses as hiking, photography, and other non-vehicle oriented uses were not considered to be impacted by the project, and were therefore not discussed in this chapter. For a discussion of all recreation activities occurring in the desert, refer to Chapter 3 of the draft EIS/EIR.

10.3 It is Bureau of Land Management policy to make available mineral material sites for state, county, or other government agency use.

10.4 Consultation with desert tortoise experts during the last few months resulted in development of the final project proposal (Alternative VII). This alternative would consolidate and retain a larger area of desert tortoise habitat and still allow the objectives of the LTA Project to be met.

Presumably Consolidation zones would lessen adverse impacts occurring under current land management practices and the area would receive Class L designation, and be bounded by Fort Irwin on the north and west, and extend south of Highway 58 to include area north of Silver Lakes, and on the west - to abut the eastern boundary of Edwards Air Force Base.

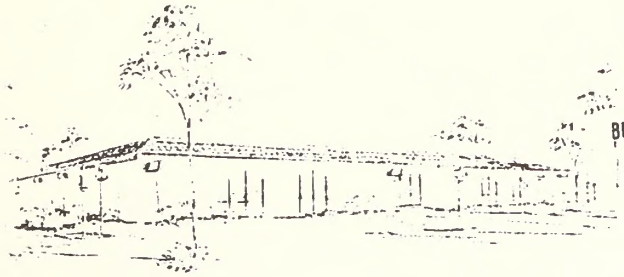
10.5

The sooner you designate Class L for the whole described area the better. The voluntary land swap plan you are proposing could take a century to complete and in the meantime the tortoise populations in that crucial habitat could crash.

Sincerely,

Mrs. Warren W. Forgey

10.5 Consolidation zones would be classified as "L", and retention zones under existing classifications. Selection of Alternative VII would result in a net increase in acreage under Class "L" within the project area.



Incorporated 1965

City of California City

City Hall

21000 HACIENDA BLVD — CALIFORNIA CITY, CALIFORNIA 93505

RECEIVED
BUREAU OF LAND MANAGEMENT
1987 OCT 16 AM 11: 42
BARSTOW RESOURCE AREA
BARSTOW, CA.
PHONE (619) 373-8661

October 15, 1987

Land Tenure Adjustment Project
Barstow Resources Area
Bureau of Land Management
150 Coolwater Lane
Barstow, CA 92311

ATTN: Mr. Gerald E. Hilier
District Manager

Gentlemen:

The Western Mojave Land Tenure Adjustment (LTA) Project is a positive step in the right direction.

11.0 California City is in support of the concept of the project as it applies in particular to de-patching and converting government-owned land within California City to private ownership.

Very truly yours,

Stanleigh J. Megargee
City Manager

SJM/rsb

cc: City Engineer
City Attorney
Planning File

Letter 11 - California City - Megargee

11.0 Thank you for your comment.

RECEIVED
BUREAU OF LAND MANAGEMENT
1987 OCT 30 AM 11: 23
BARSTOW RESOURCE AREA
BARSTOW, CA.

329 Perdew Ave.
Ridgecrest, CA 93555
Oct. 27, 1987

Barstow Resource Area
Bureau of Land Management
150 Coolwater Lane
Barstow, CA 92311

Dear Sir:

Subject: Western Mojave Land Tenure Adjustment Project

12.1 It is indeed tragic that the interests of the Air Force and the Department of Defense take precedence over the protection of threatened or endangered wildlife on the desert. It appears that the Bureau of Land Management has been grossly derelict in its responsibility to protect its resources by acquiescing to the Air Force on such a grand scale. Surely an Alternative could have been devised that would have prevented any loss of crucial or critical desert tortoise habitat, yet accommodated most of the Air Force's needs/wants.

12.2 Nowhere does the draft EIS/EIR discuss possible mitigation measures for this loss of tortoise habitat. If a private company were to propose doing a job with such a large negative impact on a threatened species, they would be required (forced?) to mitigate this loss. Why shouldn't the Air Force be required to do the same? As a minimum, the Air Force could buy up private lands within the consolidation area equal in acreage to that of crucial or critical tortoise habitat which the Bureau of Land Management is proposing to trade for the private lands needed to effect consolidation. There would then be little or no loss of important tortoise habitat and the Bureau of Land Management could then continue to protect and manage all of this resource. Let's not trade away any of our valuable heritage.

12.3 What are the consequences to the plan if private land owners refuse to trade or sell their lands?

Sincerely yours,

Ronald A. Henry

Ronald A. Henry

Letter 12 - Ronald A. Henry

12.1 The desert tortoise is a Class 2 candidate species for federal listing. It is designated fully protected by the State of California and "sensitive" by Bureau of Land Management. The Mohave ground squirrel is designated as threatened by the California Fish and Game Commission. These designations, while imparting various degrees of protection, are not equivalent to official federal listing under the Endangered Species Act.

12.2 In response to public concerns with potential effects on desert tortoise habitat, the final proposal (Alternative VII) was developed. Please see chapters 2 and 4 of the final EIS/EIR.

12.3 The major premise of this project proposal is that land exchanges entered into would be completely voluntary. There are no other consequences. Additional information concerning potential safety or noise hazards would be available to private landowners via County Safety/Noise Overlays.

FRIENDS OF THE TRAIL
22102 Covello St., Canoga Park, Ca. 91303 (818) 348-8381

RECEIVED
BUREAU OF LAND MANAGEMENT
1987 NOV -2 AM 8 11
BARSTOW RESOURCE AREA
BARSTOW, CA.

October 29, 1987

Attn: LTA Project
BLM, Barstow Area
150 Coolwater Ln.
Barstow, CA, 92311

Subject: Comments to Draft EIR/EIS of the Land Tenure Adjustment project.

Dear Sir:

The Friends Of The Trail have reviewed the Draft EIR/EIS of the Land Tenure Adjustment project and would like to make the following comments:

13.1 We find the entire document unacceptable because the project as a whole, and all of the alternatives failed to consider a key element in the management of the area. This element is the implementation of the **Statewide Motorized Trail System** as described in the EDAW plan and adopted by the California OHMVR Commission. This plan identifies the need for a public right-of-way for "Green Sticker" vehicles between Red Mountain and Stoddard Valley. This right-of-way should have been addressed during the planning process and been included in at least one of the alternatives.

13.2 It is obvious that the EDAW plan was not addressed since it is not listed in the Bibliography as one of the cited references. It is also obvious that the organization of the project was biased against recreation since the preparers included:

3 individuals for Wildlife

2 individuals for Range/Grazing

2 individuals for Soils

1 individual for Noise

2 individuals for Archaeology/Paleontology

2 individuals for Botany

and for Recreation, the Project Manager was "responsible for preparation" along with minerals and resources. His resume did not list any education (Ph.D. in Fisheries Management) or experience in recreation.

13.3 Considering that the BLM has proposed that approximately ten million dollars of the "Green Sticker" fund be invested at El Mirage, which is in the study area of this project, it is inexcusable that they totally ignore the Statewide Motorized Trail plan.

Letter 13 - Friends of the Trail - Counts

13.1 A Statewide Motorized Trail System has not been precluded by implementation of any action alternative. A motorized trail system utilizing existing rights-of-way could be implemented when a plan has been submitted to the appropriate agencies and approved.

13.2 Individual specialists selected for this analysis were chosen based upon those resources of concern with respect to potential levels of impact from actual land tenure adjustment. Impacts to recreation were analyzed, but were considered to be at a lower level relative to impacts on other resources. Agency review by several recreation specialists was provided.

13.3 The El Mirage area is expressly excluded from the LTA Project area analysis, and was not considered in any alternative.

13.4 FOTT requests that the final plan include a corridor to facilitate the SMTS or that the process be redone to address this element which was not considered.

Sincerely,

Jerry Counts

Jerry Counts

cc
OHMVR Commission
OHV Coalition
FOTT

13.4 See response to 13.1.

THE CALIFORNIA NATIVE PLANT SOCIETY

DEDICATED TO THE PRESERVATION OF CALIFORNIA NATIVE FLORA

RECEIVED
1987 NOV -4 AM 11:59
BARSTOW RESOURCE AREA
BARSTOW, CA.

Gerald E. Hillier
Attention: Land Tenure Adjustment Project
Barstow Resource Area, BLM
150 Coolwater Lane
Barstow CA 92311

2 November 1987

Dear Sir,

The Land Tenure Adjustment (LTA) under any of the action alternatives proposed will have negative impacts on desert tortoise habitat, grazing allotments, and sensitive plant species. Consolidation will have a positive impact ~~on impact~~ on desert tortoise habitat, Areas of Critical Environmental Concern (ACECs) and a Wilderness Study Area (WSA). Cultural and paleontological resources will not be negatively impacted under any alternative. Department of Defense (DOD) (Edwards Air Force Base (AFB) and George AFB) testing and training will be protected and public land resource values will be more uniformly managed.

14.1 From the standpoint of conservation of desert resources, maximum protection afforded wildlife and sensitive plants, and non-destructive recreation, Alternative V is the option preferred by the California Native Plant Society.

Under Alternative V, the ACECs, WSA, cultural resources, tortoise habitat, and DOD values would be consolidated to the maximum extent (333,687 A). The anount of public land in the retention zones (101,280 A) and disposal zones (66,733 A) would be minimized. Land in both consolidation and retention zones would be designated Multiple Use Class (MUC) L (454,867 A). Management of Class L lands is oriented toward giving priority protection to sensitive, natural, scenic, ecological, and cultural resources while placing limitations on other uses that may conflict with or degrade these values.

14.2 The LTA project area supports 700+ species of vascular plants, eleven of which are species of concern. That portion within Los Angeles County includes three Significant Ecological Areas (SEAs):

Edwards AFB: Protection of the Mohave spine flower and mesquite,

Rosamond Lake: Shadscale scrub (western Mohave saltbush) plant community, and

Joshua tree woodland habitat.

In Kern County, the Joshua tree, all cacti, and all mariposa lilies are protected by County Ordinance. There is one Unusual Plant Assemblage (UPA), the Western Mohave Desert Saltbush Assemblage. This UPA constitutes a significant part of the habitat of the desert tortoise and the Mohave ground squirrel.

Factors considered for recommending Alternative V:

Letter 14 - The California Native Plant Society - Clemons

14.1 Alternative VII (the final project proposal) has been developed to address those natural resources while allowing achievement of project objectives. See also chapters 2 and 4 in this document.

14.2 Alternative VII incorporates many of the aspects of Alternative V and allows a sufficient disposal base to accommodate acquisition of private lands within the consolidation zone.

1. Plant resources: The UPA will be unavoidably impacted by changes in land ownership and use; 272,800 A in consolidation, 146,980 A in retention, and 71,330 A in disposal. Loss of acreage in disposal zones is not anticipated to adversely affect the UPA.

2. Recreation and public access: Alternative V has the most beneficial effect for most recreational uses. This effect is due to the largest consolidation area (353,587 A). This positive is confined to this issue. Greater restrictions will apply to ORV uses in the consolidation zones that are changed from MUC M to MUC L. This alternative would benefit recreational users by providing large, contiguous areas under public management for such activities as hiking, photography, and other non-vehicle oriented uses.

3. Visual and aesthetic resources: Scenic lands in the vicinity of Rainbow Basin ACEC will be consolidated into federal (public) ownership.

4. Areas of Critical Environmental Concern (ACEC):
Black Mountain ACEC is entirely in a consolidation zone. No private land would exist within several miles of the ACEC boundaries.
14.2 Eriophyllum ACEC is entirely within a consolidation zone and is protected for several miles on all sides.
Harper Dry Lake ACEC would be in a consolidation zone; however, disposal zone land would abut the ACEC boundary on the western and southern boundaries, potentially impacting the resource values of the ACEC.
Kramer Hills ACEC would be in a consolidation zone but would have two of its six miles of boundary adjacent to retention zone private land.
Rainbow Basin ACEC would be within a consolidation zone. This enhanced protection would benefit the resource and scenic values of the ACEC.
Helendale ACEC would be in a retention zone. This designation does not promote protection of resource values in the ACEC.

5. Black Mountain WSA is within a consolidation zone. Wilderness resources and values will be enhanced.

6. Range and grazing resources: Permittees that strongly depend on these public lands in their livestock operation would be detrimentally impacted. Since each Animal Unit Month (AUM) allotment is provided at a
14.3 considerable loss to the U.S. Treasury the elimination of this subsidy is considered to be in the best interests of the public. Cattle pollute water resources, promote erosion, and trample sensitive plants, encouraging the spread of alien weedy species.

Thank you for the opportunity to comment,

Sincerely,

Duffie Clemons

Duffie Clemons
Desert Representative, CNPS

California Native Plant Society
San Diego Chapter
P. O. Box 1390
San Diego, CA 92112

Copy: M. Huffman
R. Leerhoff
J. Kerbavez
R. Steele
J. Stewart

14.3 See response to 10.1.

SIERRA CLUB, SAN DIEGO CHAPTER
1549 El Prado
House of Hospitality, Balboa Park
San Diego, California 92101

RECEIVED
BUREAU OF LAND MANAGEMENT
1987 NOV -5 PM 12: 11
BARSTOW RESOURCE AREA
BARSTOW, CA.

2 November 1987

Gerald E. Hillier
Attention: Land Tenure Adjustment Project
Barstow Resource Area, BLM
150 Coolwater Lane
Barstow, CA 92311

Dear Sir,

The Western Mohave Land Tenure Adjustment (LTA) under any of the action alternatives proposed will have negative impacts on desert tortoise habitat, grazing allotments, and sensitive plant species. Consolidation will have a positive impact on desert tortoise habitat, Areas of Critical Environmental Concern (ACEC), and a Wilderness Study Area (WSA). Cultural and paleontological resources will not be negatively impacted under any alternative. Department of Defense (DOD), Edwards Air Force Base (AFB) and George AFB, testing and training will be protected and public land resource values will be more uniformly managed.

From the standpoint of conservation of desert resources, maximum protection afforded wildlife and sensitive plants, and non-destructive recreation, Alternative V is the option preferred by the San Diego Chapter of the Sierra Club.

Under Alternative V the ACECs, WSA, cultural resources, tortoise habitat, and DOD values would be consolidated to the maximum extent (333, 687 A). The amount of public land in the retention zones (101, 280 A) and disposal zones (66,733 A)would be minimized. Land in both consolidation and retention zones would be designated Multiple Use Class (MUC) L: management oriented toward giving priority protection to sensitive, natural, scenic, ecological, and cultural resources while placing limitations on other uses that may conflict with or degrade these values. Class L lands would total 454,867 A.

15.1

The LTA project area supports 300+ species of vertebrates including 68 reptile species, 134+ species of birds, and 115 species of mammals. The bald eagle and Yuma clapper rail are federally listed as threatened or endangered. The desert tortoise is designated "fully protected" by the State of California and "sensitive" by BLM. The Mohave ground squirrel is state listed as rare and threatened. The Mohave vole is of special interest because of its very limited distribution.

The LTA project area supports 700+ species of vascular plants; eleven of which are species of concern. That portion of the LTA within Los Angeles County includes three Significant Ecological Areas (SEA): Edwards AFB--Protection of the Mohave spine flower and mesquite; Rosamond Lake--Shadscale scrub (Western Mohave saltbush) plant community; and Joshua Tree woodland habitat. In Kern County, the Joshua tree, all cacti, and all mariposa lilies are protected by County Ordinance. There is one Unusual Plant Assemblage (UPA), the Western Mohave Desert Saltbush Assemblage. This UPA constitutes

Letter 15 - Sierra Club, San Diego Chapter - Clemons

15.1 Many of the important areas shown in Alternative V would also be consolidated or retained in Alternative VII. Alternative VII also provides a sufficient disposal base to allow for project implementation which V might not. VII was developed following consultation and review with representatives of California Department of Fish and Game, the Desert Tortoise Council, and the Sierra Club. See discussion in chapters 2 and 4 of the final EIS/EIR.

a significant part of the habitat of the desert tortoise and the Mohave ground squirrel.

Factors considered for recommending Alternative V:

1. Paleontological resources would benefit from more effective management.

2. Wildlife resources: Alternative V protects the unique habitat of the Harper Dry Lake ACEC. It would also result in the least amount of desert tortoise habitat loss. The Mohave vole and the Mohave ground squirrel would have stable habitat areas.

3. Plant resources: The UPA will be unavoidably impacted by changes in land ownership and use; 272,800 A in consolidation, 146,980 A in retention, and 71, 330 A in disposal. Loss of acreage in disposal zones is not anticipated to adversely affect the UPA.

4. Cultural resources: Maximization of acreage in the consolidation zones under Alternative V would result in the largest shift of known cultural resource sites from private to public ownership.

5. Recreation and Public Acess: Alternative V has the most beneficial effect for most recreational uses. This effect is due to the largest consolidation area (353, 587 A). This positive effect is confined to this issue. Greater restrictions will apply to ORV uses in the consolidation zones that are changed from MUC Class M to Class L. This alternative would benefit recreational users by providing large, contiguous areas under public management for such activities as hiking, photography, and other non-vehicle uses.

15.1

6. Visual and aesthetic resources: Scenic lands in the vicinity of Rainbow Basin ACEC will be consolidated into federal (public) ownership.

7. Areas of Critical Environmental Concern (ACEC):

Black Mountain ACEC is entirely in a consolidation zone under Alternative V. No private land would exist within several miles of the ACEC boundaries.

Eriophyllum ACEC is entirely within a consolidation zone and is protected for several miles on all sides.

Harper Dry Lake ACEC would be in a consolidation zone; however, disposal zone land would abut the ACEC boundary on the western and southern boundaries, potentially impacting the resource values of the ACEC.

Kramer Hills ACEC would be in a consolidation zone but would have two of its six miles of boundary adjacent to retention zone private land.

Rainbow Basin ACEC would be within a consolidation zone. This enhanced protection would benefit the resource and scenic values of the ACEC.

Helendale ACEC would be in a retention zone. This designation does not promote protection of resource values in the ACEC.

8: Black Mountain WSA is within a consolidation zone. Wilderness resources and values will be enhanced.

9. Range and grazing resources: Permittees that strongly depend on these public lands in their livestock operation would be detrimentally impacted. Since each Animal Unit Month (AUM) allotment is provided at a considerable loss to the U.S. Treasury the elimination of this subsidy is considered to be in the best interests of the public.

15.2

10. Military testing & training would be enhanced. Consolidation would include the supersonic corridor, the Precision Impact Range Area (PIRA), and part of the George AFB ingress corridor.

Thank you for the opportunity to comment. Sincerely,

Duffie Clemons

Duffie Clemons
Desert Subcommittee
San Diego Chapter, Sierra Club

Copy, H. Allen
J. Anderson
B. Bamberger
J. Davies

15.2 See response to 10.1.

RECEIVED
BUREAU OF LAND MANAGEMENT
1987 NOV -9 PM 3:28
CALIFORNIA DESERT DISTRICT
RIVERSIDE, CA.

TECHNICAL DEPARTMENT

USBORAX

Route | Date | Initials
2 11/10 K
PIPE
3 WA
MIN 7 copy
AMS Barstow
Action By: 3
Return To:

November 5, 1987

Mr. Gerald E. Hillier
District Manager
United States Department of the Interior
Bureau of Land Management
California Desert District
1695 Spruce Street
Riverside, California 92507

RE: Land Tenure Adjustment Project EIS/EIR

Dear Mr. Hillier,

RECEIVED
BUREAU OF LAND MANAGEMENT
1987 NOV 24 AM 11:25
BARSTOW RESOURCE AREA
BARSTOW, CA.

16.0 I would like to make a few observations, comments and suggestions to your EIS/EIR for the Land Tenure Adjustment Project as it applies to the mineral exploration/production community, as follows:

1. No geologist is on the list of preparers.

2. Exploration is not better served by consolidation of Federal holdings, as your EIS/EIR states.

3. Although claims may not be involved in the exchange, the claimants ability to add either mill-site claims or new claims or to acquire land needed for production would be thwarted.

Below, each of these points is discussed more fully.

16.1 1. The desert is the geologist's laboratory whether he is studying its rock-types and structure, its mineral potential, its capability of producing water, or its fossil record. A geologist should have been on the preparing panel so that he could help assess the impacts different land management schemes would have on his laboratory. It seems inconceivable that impacts, as summarized in Table 2.2, could differ among the Groundwater, Geology, Paleontology and Minerals resources to the extent the panel has determined.

16.2 It is apparent that potential resources (or known resources which are not well documented) were not considered, at all. For example, paleontological resources include not only the well known Miocene vertebrate locales of the Rainbow Basin and nearby similar non-marine sediments, they also include the petrified

3075 WILSHIRE BOULEVARD · LOS ANGELES, CALIFORNIA 90010 · (213) 381-5311
MAIL ADDRESS P. O. BOX 75128 SANFORD STATION LOS ANGELES, CALIFORNIA 90075

Letter 16 - U.S. Borax - Pennel

16.0 Specific comments are addressed below.

16.1 Geological information, including mineral evaluation, was reviewed by two Bureau of Land Management geologists. Final site specific mineral valuation would be conducted on all parcels prior to exchange, during the second tier analysis. Table 2.2 has been revised and clarified.

16.2 It is not the intention of this EIS/EIR to perform the function of a research paper. For the purposes of this analysis, paleontological resources are recognized as a resource of potential significance. This will lead to further paleontologic study of public lands identified for site specific exchange as part of a second tier assessment.

palm-root localities so widespread in the Western Mojave. No consideration has been given to the invertebrate fossils, yet dry lakes are wrongly considered to contain fossil resources.

16.2 Access for prospecting for mineral deposits or fossils, areas for field studies (geological mapping, geophysical surveys, and the like) for university students, and regions to rome for the rockhound, are all impacted by any reclassification of land. A geologist could have helped assess what impact any reclassification of land might have on these geologic activities.

2. Mineral exploration is better served by a large area of scattered federal land rather than consolidation of federal land into one smaller area. Exploration needs both varied geologic terrain and the encouragement that wide-spread, scattered, locatable federal land provides. When federal land is consolidated, fewer geologic environments are available for the preliminary stages of exploration: the high cost, long lead times and small-sized plots of private land hinder prospecting and regional geologic and geophysical surveys.

6.3 The contention that minerals resources would not be impacted does not take into consideration past, present and future exploration efforts designed to find hidden deposits or extend known mineral districts. It may be easier for the BLM to manage exploration activities where land is consolidated, but explorationist search where the rocks are right, and the land is available, not where it is easier or less easy for the BLM to control.

3. One of the strengths of the 1872 mining law is that it encourages risk by offering rewards. It says to the prospector, "You find it, you can own it and produce it." It even encourages the prospective producer by allowing the acquisition of needed

16.4 acreage for mills and other production-related activities. Even though the Land Tenure Adjustment Plan recognizes valid claims, it may, nonetheless, take rights from present and future producers because adjacent federal lands would be privatized: the rights to pursue and claim extensions of known mineral deposits, to acquire contiguous mill-site claims or to purchase needed land from the federal government will be taken from present claim-holders.

It is obvious from the relative amounts of respective material that the EIS/EIR committee had strong representation in the wildlife, grazing, noise, botany, soils, archeology, and hydrology fields, and your list of preparers reflects these

16.5 strengths. In contrast, geologic and mineral material is lacking in specifics so apparent in other fields, ignores potential resources, is limited in scope. Because the geologic input is of limited quality, the assessments of impacts on minerals and geology resources are wrong and inconsistent with those shown for paleontological and hydrological resources.

16.3 See Additions, Deletions and Corrections, Table 6.1 in the final EIS/EIR.

16.4, 16.5 Disposal of tracts with high mineral potential or tracts encumbered with mining claims will be carefully evaluated to insure that disposal is in the public interest, and if so determined, then only subject to valid existing rights. We do acknowledge that privatized land could preclude future or continuing operations, however, our observation has been that industry has generally been successful in securing private property for mineral development. Site specific mineral analysis will be made prior to a decision to dispose of any specific parcel of public land. This will be part of the second tier analysis, and be performed by a BLM approved geologist.

Attached are a few comments, jotted down as I perused the subject draft report. If you have any questions about these thoughts, I'd be glad to discuss them with you.

Thank you for the opportunity to review the draft. I look forward to reading the next installment. I have confidence that you and your office will continue to apply your considerable skills to the problem at hand and present a workable, even-handed alternative.

Sincerely,

William M. Pennell
Senior Geologist

Comments to Land Tenure Adjustment
EIS/EIR

	Page/Paragraph	Comment
	iii 4	Areas of Controversy: All alternatives will result in loss of varied geologic terrain for minerals exploration (See text of letter).
16.6	iv 3	Preferred Alternative: Impacts to resource values from this alternative include: loss of federal lands, open to claim location, adjacent to valid existing claims, loss of opportunity for exploration community to explore for the nation's minerals on a spread of Federal acreage covering diverse geologic settings.
16.6	v table	Inconsistency between Groundwater, Geology, Paleontology and Minerals designation codes for each alternative. Both protection and access (availability) issues need to be addressed for each category. Private land does not provide the setting for student geologic research or paleontological collection any better than it allows access to explorationists to assess mineral potential. To say NO IMPACT to Geology from all alternatives is wrong: access would be denied, geologic research would suffer.
16.7	General	Computer maps are better than last time but still unacceptable. San Bernardino Base Line runs east-west through (of all places) the City of San Bernardino, not along the top of Twp 11 North. Divisions between townships need to be darkened. An insignificant lake west of highway 395 is shown but the extensive Superior Dry Lakes are not. What military reservation surrounds Mojave River Forks Reservoir? I couldn't find utility corridors on any of the maps. Locations of important mineral producers, past production, present mining claims, etc. should have been posted on maps.
16.8	General	I wish there was more discussion on the imbalance between the consolidation zone acreage and the Disposal zones' acreage (see Table 2.1), costs in both time and dollars to effect trades, actual management and procedures for accomplishing the various alternatives.
16.9	3-10 / 3.2.2.2	Why 3) "An unnamed lake in Sec 5. . ." when there are numerous such small, insignificant playas in the desert: those around Boron, small areas to the southeast of Cuddeback Lake, etc. Since you have nothing to say about it, why single it out for special mention?
16.10		Harper Dry Lake Marsh may be a unique habitat in the desert. . .so is Lake Dolores, so is the Holiday Inn

16.6 The Summary of Impacts Table on page v has been revised and clarified for inclusion in the final EIS/EIR. See the Executive Summary.

16.7 You are correct, the map is incorrectly labeled. The designation should show that the public land surveys change baselines and meridians at this point. Above the line, the Mount Diablo Baseline and Meridian are used. Below the line, the San Bernardino Baseline and Meridian are used. The Army Corps of Engineers manages Mojave River Forks Reservoir. Specific information on utility corridors, important mineral producers, past production, and present mining claims is available at the Barstow Resource Area office. Because this project analyzes a general plan for the land pattern of the area, and specific exchanges will be analyzed further in a second tier analysis, this information was not mapped in the LTA Project EIS/EIR.

16.8 The LTA Project proposal addresses a general plan to adjust land patterns. This adjustment would occur through voluntary exchanges. Exchange procedures, directly by BLM regulations, would be used to determine the appraised value of lands proposed for exchange, and the steps to exchange completion. An implementation plan to accomplish the exchanges will be developed, which will include priorities and procedures.

16.9 Available maps indicate this body to be a lake, not a playa. All mapped surface waters were included in this analysis.

16.10 Harper Lake, and other habitats of this type may be artificially maintained, but are currently managed as if they were permanent. This type of area provides replacement habitat for historic habitat now unavailable due to human encroachment, use, and residence in other parts of the desert such as along the Mojave River.

swimming pool in Victorville. It is artificially maintained. Why not build a zoo and put extreme protectionist classifications meant for natural settings upon the zoo.

6.11

3-11 / 3.2.3 Earth Resources include gems and minerals which are the attraction to rock-hounds. These, and the access to them, are completely ignored in this section.

3-12 / 8 This paragraph is so non-specific so as to be nearly worthless. Where are the details of the mining activities of these districts, their past production, their mineral species (you certainly spent enough time on animal and plant species), present exploration and development activities. Even those mineral commodities mentioned are not discussed in depth, valued or placed on a map.

3-13 / 3.2.3.2 Which valleys dry lakes or playas, each of which is sensitive for paleontological resources? Ask a rockhound where the palm-root or invertebrate fossils are.

16.12

3.3 / BIOLOGICAL ENVIRONMENT The preparers of this section served their subject, documented their findings and even gave their opinions, very effectively, especially in comparison to the efforts of similar Physical Environment sections.

There is documentation of the foods and other necessities of life for all the creatures of the desert except man. Maybe a similar treatment, listing the water, mineral, air, recreation, housing, fuel, etc., needs of the human species and an opinion of where such resources will come when all the wild lands are protected, is in order.

16.13

3-15 / 3.3.2.2 The relationship of the Bald Eagle to Harper Dry Lake, an artificially maintained environment, is discussed. Why the emphasis (or even a mention) of the potential suitable habitat for a non-indigenous species, and yet no mention, at all, of the potential for any of numerous mineral commodities.

In the Clapper Rail section, a statement that the one sighting is not sufficient evidence to consider an established population of the species: why no similar statement in the Bald Eagle section where no sightings are mentioned.

3-41 / Harper Lake ACEC Here a Bald Eagle sighting is mentioned. . . Do Bald Eagles like the low-level and high-speed aircraft activity? What happens to this environment when irrigation water ceases to run-off?

16.14

3-58 / GEOLOGY AND MINERALS Again, some of the minerals produced in the region are touched upon, but none of the specifics so apparent in the sections on animals or plants is included. There is, for example, no mention of the gold being produced southeast of Kramer Junction nor the known borate reserves immediately north of Kramer Junction. Facts, numbers . . .reserve tonnages, grades, production rates and output, actual

16.11 See Additions, Corrections and Deletions, Table 6.1 in the final EIS/EIR. Also see response to 16.5. Some additional information is available on pages 3-58 and 3-59 of the draft EIS/EIR. For this project area analysis, general information on mining is sufficient. Specific data on past, present, and future mineral development potential will be used as part of the second tier analysis.

16.12 Implementation of the LTA Project can assist in facilitating efficient management of public lands and the orderly development of private lands. Both of these objectives would seem to be in the public interest and would therefore assist in achieving human needs.

16.13 Potentially suitable habitat for federally listed species must be addressed under the provisions of the Endangered Species Act. Harper Lake ACEC may provide potential suitable habitat for the bald eagle.

16.14 Please refer to responses to 16.3 and 16.5.

locations, etc., etc. The sand and gravel section is better but without locations on maps, not just place names, for both the resource and the areas of usage, the discussions of impacts are to nebulous.

4-1 ENVIRONMENTAL CONSEQUENCES

General - Note the unjustifiable discrepancy in the detailed analysis of the Biological and Human Environmental impacts and the scrimpy and, in some instances, non-existent discussion of Physical Environmental impacts. Man is dependent on what he gets from his environment - remove access and you doom the species.

The statement that Land exchanges will be subject to prior rights of mining claimants is true only for the claimed land. . .the right to acquire additional Federal land for a productive facility would be denied (see letter).

4-52 / 4 Mineral resource may be lost. . .a concept that should run through all discussions of the alternatives. . .not only because of competing zoning but also from the lack of favorable geological environments or locatable, federal land.

16.14

4-53 / 4.8 Include: Loss of access for explorationists and rock-hounders to the minerals in the disposal areas. Potential loss to the nation of the minerals that underlie the disposal areas. Loss of federal lands for future mineral production activities.

Somewhere (lost exact spot) suggestion was made that mineral's production facilities might infringe upon height restrictions in air-flight corridors. . .some recognition should be made that minerals are where you find them, that the productive facility must be located where the deposit is, and that airplanes can easily fly around such stationary structures. The Boron mine/plant sits on-line with Edwards, the pilots know it is there, there have been no mishaps. No restriction should be made with respect to such facilities' height or location.

4-53 / 4.9 Management of paleontological resources seems to be the only concern of this EIR/EIS. What of the other geological and mineralogical resources? What of the rock-hounder's sites?

BRISTLECONE • CHAPTER

CNPS

DEDICATED TO THE PRESERVATION
OF THE CALIFORNIA NATIVE FLORA

P.O. Box 330
Lone Pine CA, 93545
November 9, 1987

Barstow Resource Area
Bureau of Land Managament
150 Coolwater Lane
Barstow CA, 92311
ATTN: Land Tenure Adjustment Project

Dear People:

17.1 We have reviewed your draft environmental impact statement/report for the proposed Western Mojave Land Tenure Adjustment project.

As environmentalists we agree with your decision to select Alternative VI. Addition of the resource values relating to environmental interests for each Alternative in your Summary Table places VI substantially above the totals for the other Alternatives.

Thank you for having provided us with the opportunity to review this document.

Yours very truly,

Vincent Yoder

Vincent Yoder, Conservation Chair
Bristlecone Chapter
California Native Plant Society

cc: Hillier

Letter 17 - Bristlecone Chapter CNPS - Yoder

17.1 We have further modified our project proposal (Alternative VII) to more fully address concerns raised by other parties who commented on the draft EIS/EIR.

United States
Department of the Interior

Fish and Wildlife Service
Lloyd 500 Building, Suite 1692
500 N.E. Multnomah Street
Portland, Oregon 97232

In Reply Refer To: Your Reference:

NOV 6

RECEIVED
BUREAU OF LAND MANAGEMENT
1987 NOV 12 PM 1:29
BARSTOW, CA.
BARSTOW RESOURCE AREA

MEMORANDUM

TO : Area Manager, Bureau of Land Management, Barstow Resource Area Office, 150 Coolwater Lane, Barstow, California 92311

FROM : Attn: Assistant Regional Director, Fish and Wildlife Enhancement, Portland, Oregon (AFWE-SE)

SUBJECT: Land Tenure Adjustment Project Draft Environmental Impact Statement/Report

We have reviewed the subject draft document, addressing the intent of the Bureau of Land Management and Department of Defense to consolidate current checkerboard ownership pattern lands in the western Mojave Desert. The proposed project may particularly affect two candidate wildlife species, the desert tortoise and Mohave ground squirrel.

In general, the draft clearly presents anticipated project acreage gains and losses to these species for each of six alternatives. We also concur with the document assessment that, irrespective of alternative selected, there will be adverse project effects to these species and other biological resources. Our specific comments are as follows:

18.1 (1) The proposed action, alternative VI, would consolidate the smallest amount of sensitive wildlife habitat of any alternatives. This is contradictory to management specified within the Desert Plan, emphasizing area retention, consolidation, and cooperative management (refer to Wildlife Habitat Management Area W-21, Table 2, of the Desert Plan). Alternative V, however, would result in substantinlly lesser reduction of high density desert tortoise habitat (1,344 acres as opposed to 13,056 acres) and a substantial gain of moderate density desert tortoise habitat (a gain of 69,120 acres as opposed to a net loss of habitat for all other alternatives). All habitats within the desert tortoise Fremont-Stoddard crucial habitat area would also be retained and/or consolidated. We strongly urge reconsideration of a preferred alternative that maximizes protection to sensitive wildlife and botanical resources. It appears that Alternative V, with modifications undertaken using input from State and Federal wildlife agencies, conservation groups, and individuals with prior demonstrated experience

Letter 18 - U.S. Fish and Wildlife Service - Teeter

18.1 Alternative VII, our final project proposal, was developed to alleviate impacts associated with Alternative VI, following consultation with desert tortoise experts. See chapters 2 and 4 in the final EIS/EIR. Development of a wildlife habitat management plan is still planned for the area, dependent on budget and personnel priorities.

with one or more sensitive species, would present an environmentally preferable alternative. We recommend that, minimally, any net loss of high density desert tortoise habitat within the land tenure adjustment boundary should be partially offset by off-site consolidation of similar density desert tortoise lands with a high potential for effective long-term species management. Lands within the neighboring Desert Tortoise Natural Area or the Chuckwalla Bench Area of Critical Environmental Concern would provide primary locations for such offsets. Development of a wildlife Habitat Management Plan for the area, originally specified for completion between 1983 and 1985 in the Desert Plan, should precede any land pattern adjustments to ensure maximum attention to extant wildlife resource values.

(2) The document centers on the "mechanics" of land tenure adjustment, presenting acreage estimates and specific areas that would be consolidated or exchanged. It does not, however, provide a detailed analysis of impacts of future agency-initiated actions on constituent area resources. For example, land consolidation in desert tortoise habitat will not prove beneficial should grazing allotment allocations be expanded, route networks across currently private lands be authorized, or mining development ensue. Pages 4 through 48 of the Draft Environmental Impact Statement/Report emphasizes this possibility, stating the "consolidation of the public land could...result in range improvement and increased livestock grazing". More detailed discussion of intended management actions in consolidation areas should be provided for each alternative. Opportunity for public and agency review of planned management measures for such areas prior to any authorization should be an integral component of this process.

18.2

(3) Additional public and agency input into the Bureau of Land Management route designation process within the project consolidation zones should be provided. Many "spur" routes in the Mojave Desert have been authorized by the Bureau to allow landowner access to interspersed private lands. These routes collectively contribute significantly to desert tortoise and other wildlife mortality and habitat loss over large portions of the Mojave Desert. Rationale for initial route designation will not be appropriate as such lands are acquired as a part of the public domain. Subsequent route closure by the Bureau would be a beneficial action towards long-term desert tortoise and other wildlife management.

18.3

(4) We concur with the project intent of consolidating interspersed private lands within several designated Areas of Critical Environmental Concern. Land consolidation is consistent with long-term management objectives and will significantly enhance resource manageability.

18.2 Any change in grazing authorization, expansion of road network, or approval of mining plan would follow a site specific interdisciplinary evaluation process by BLM. The needs of vegetation, wildlife species, and other resource uses would be considered prior to approval of any of these actions, which would include opportunity for agency and public review.

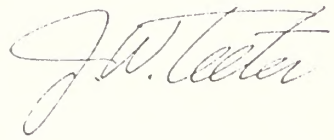
18.3 Retention or closure of roads on land acquired by the BLM under the voluntary exchange process would be on a case by case basis in relation to MUC designations and management objectives for the area in question.

18.4 (5) Page 3 through 15 of our copy of the Draft Environmental Impact Statement/Report is blank. This page, unfortunately, appears to have included text relating to the occurrence and distribution of the bald eagle and other listed species within the project area. It should appropriately be included in the final document text. Aside from the bald eagle and Uma clapper rail, we are unaware of any other federally-listed species within the project area boundary.

18.5 (6) Page 3 through 25 of the Draft Environmental Impact Statement/Report lists the Bakersfield cactus (Opuntia treleasei) as occurring within the project area. This currently recognized species is confined to a limited portion of the southern San Joaquin Valley and should appropriately be omitted from the document text.

18.6 (7) Text relating to growth-inducing effects of consolidation of private lands is overly abbreviated. Aside from direct habitat loss on private lands, impacts may extend for considerable distances onto adjacent retained public lands from increased vehicle use, shooting or poisoning, predation by feral cats and dogs, increased densities of ravens, coyotes and other predators from availability of food, or other factors.

18.7 Thank you for the opportunity to provide comments. Please provide this office and our associated Sacramento and Laguna Niguel field offices with copies of the final Environmental Impact Statement/Report when available. If we may be of further assistance, please contact Gail Kobetich of my staff at FTS 460-4866.



18.8 Attachment

18.4 We regret the missed pages in your copy of the draft EIS/EIR. You have been sent an additional copy of the document. Page 3-15 of the draft EIS/EIR included text noting potential habitat for the bald eagle (with no historic sightings); and a single sighting of the Yuma clapper rail in the Harper Dry Lake Area. The sighting of the Yuma clapper rail is well outside its known range and is therefore not considered to represent an established population.

18.5 See Additions, Deletions and Corrections, Table 6.1 in the final EIS/EIR.

18.6 Quantification of this type of data was not possible in more detail than provided. Consolidation of public lands seeks to preclude just these types of impacts in the areas most suitable for management by BLM.

18.7 Thank you for your comments. We appreciate your providing a point of contact.

18.8 Attachment not included.

THE DESERT TORTOISE COUNCIL

5319 Cerritos Avenue
Long Beach, California 90805

RECEIVED
BUREAU OF LAND MANAGEMENT
1987 NOV 12 PM 1:35
BARSTOW RESOURCE AREA
BARSTOW, CA.

Nov. 9, 1987

Mr. Alden Sievers, Area Manager
ATTN: Land Tenure Adjustment Project
Barstow Area Office, Bureau of Land Management
150 Coolwater Lane
Barstow, California 92311

Dear Mr. Sievers:

Thank you for the opportunity to comment on the draft environmental impact statement/report (EIS/EIR),"Western Mojave Land Tenure Adjustment Project." In general we support the goals of the Bureau of Land Management to block up and consolidate public lands. We have the following general and specific comments.

GENERAL COMMENTS

19.1

1. We Support Alternative V. According to the document (p. 2-8), this Alternative allows consolidation of important BLM resources, including desert tortoise habitat. Alternative V offers the lowest levels of loss to very high density habitat and the highest level of gain to high density habitat. Alternative V also offers the greatest acreage for consolidation of tortoise crucial habitat.

   We oppose the Bureau's Proposed Action, Alternative VI, which allows for loss of extensive amounts of tortoise habitat. Alternative VI also promotes the fragmentation of a large block of high-density tortoise habitat occurring between Highways 395, 5B, and I-15.

19.2

   We disagree with the summary assessment for "sensitive wildlife" in Table 2.2, Summary Comparison of Alternatives and Effects. The desert tortoise, which we believe is listed under this category, would lose habitat permanently under Alternative VI. We think the situation is far more acute than the Bureau shows. Tortoise habitat and populations would be permanently lost, not merely "subjected to degradation."

   We also disagree with the rating given Alternative V in Table 2.2. The Bureau states that "Resources protected, values not enhanced." We believe that the values would be enhanced significantly, because both consolidation and retention lands would be treated as Class L. Under Alternative V, a significant block of tortoise habitat would be reclassified from multiple use class M to multiple use class L.

2. The Draft EIS/EIR is Deficient in Some Critical Areas. During the scoping process in 19B6, you wrote to us and we responded with a series of concerns. We do not believe that you have addressed some of these critical concerns.

Letter 19 - The Desert Tortoise Council - Stewart

19.1 Alternative VII was developed to alleviate adverse impacts to the desert tortoise and still allow the project objectives to be met. Thank you for your time and assistance in the development of our final project proposal.

19.2 Summary Table 2.2 has been revised and is included in the final EIS/EIR.

19.3 Deficiency 1. Discussions of Noise Impacts on Humans. On pages 3-33 through 3-35, the discussion of noise is inadequate and underplays actual sound levels from aircraft. Only two measures of sound levels, Day-Night Average Sound Level, CL_{dn} (for subsonic noise), and the C-weighted Day-Night Average Sound Level (for supersonic noise) are shown. Only CL_{dn} is shown in Figure 3-3. Both CL_{dn} and the C-weighted Sound Level are averaged values. The averaged values are just that. Where is the range of values? The highs cause the problems; the number of hours with highs are critical to the evaluation of this document. We request that this section be rewritten and that much more detailed information be presented on: impacts of noise on humans, the ranges of high and low decibel levels, the timing of the highs and lows, the numbers of hours at highs, the number of startle events/day and per season by area, etc. Such information is critical to the evaluation of the proposed action.

We protest the statement on page 4-1 about noise. The Bureau states that "a determination has been made regarding resources to which no impact could be attached. These resources are:...noise." We do not believe that the Bureau has sufficiently dealt with this issue. Quiet and solitude are critical characteristics of the Mojave.

19.4 Deficiency 2. Discussions of Noise Impacts on Tortoises and Other Animals. We identified this issue in the scoping process and it has been completely ignored here. During the late 1970's, the Bureau funded several major studies of noise. The preparers obviously did not use this material, some of which was outstanding work by Dr. Bayard Brattstrom of California State University at Fullerton and his students. One report was an annotated bibliography of the impacts of noise on vertebrates. Others are listed below.

Bondello, M. C., and B. H. Brattstrom. 1978. Ambient sound pressure levels in the California desert. Rept., Contr. No. CA-060-CT7-2737, U. S. Bureau ofLand Management, Riverside, CA 135 pp.

Bondello, M. C., and B. H. Brattstrom. 1979. The experimental effects of off-road vehicle sounds on three species of desert vertebrates. Part 1: Couch's spadefoot toad (Scaphiopus couchi); Part II: Mohave fringe-toed lizard (Uma scoparia); and part III: Desert kangaroo rat (Dipodomys deserti). Rept. Contr. No. CA-060-CT7-2737, U. S. Bureau of Land Management, Riverside, CA.

Some of the above materials have been published in a peer-reviewed work:

Brattstrom, B. H., and M. C. Bondello. 1983. Effects of off-road vehicle noise on desert vertebrates. Chapter 9. Pp. 167-206 in R. H. Webb and H. G. Wilshire (eds.), Environmental Effects of Off-road Vehicles. Springer-Verlag, New York.

You may wonder why we have cited some papers on off-road vehicle

19.3 Neither the proposed action, nor any of the alternatives including the no action alternative, would change the levels of sound likely to occur as a result of Air Force flights over the study area. This is because no action will be taken and no decision will be made to approve, disapprove, or change the flight uses of the corridors as a part of the LTA Project proposal. The only actions proposed with this project are to consolidate public and private lands separately in order to provide for better management of public lands, and more orderly development of private lands. This information was provided to assist in disclosure of existing situations within the study area. No more detailed information is available at this time.

19.4 Alternative VII was developed in order to provide for additional consolidation and retention of habitat for desert tortoise and other animals, under BLM management. Brattstrom and Bondello's research did not specifically relate either to aircraft noise or to desert tortoise or Mohave ground squirrel, and so were determined not to directly affect the analysis of the LTA Project proposal. Please also refer to response 19.3 above.

noise rather than aircraft noise. Few studies have been conducted on the effects of aircraft noise on small vertebrates. The studies by Bondello and Brattstrom indicate that very little noise (a few minutes of loud bursts) is sufficient to deafen small vertebrates, to alter critical behavioral responses, and to render them more susceptible to predation, etc. The studies of off-road vehicle noise impacts merely provide examples of the kinds of problems encountered with noise.

The desert tortoise vocalizes (see Robert G. Patterson [1972], Vocalization in the Desert Tortoise, Gopherus agassizi. M. A. Thesis, California State University, Fullerton). The vocalizations are used in courtship, defense, and when an individual is in trouble. The ability of the tortoise to hear and to respond to sounds is also critical. For example, tortoises can hear and respond defensively to the sounds of ravens. If tortoises have been deafened by sonic booms and other aircraft noise, they will not respond appropriately to each other and to predators. Mortality rates will increase.

19.5 Again, we request that no decisions be made about land-tenure adjustment until this issue has been appropriately researched. We propose that the military and/or the Bureau of Land Management fund a study immediately to determine at what levels aircraft noise will damage tortoise hearing and how aircraft noise affects the natural history and behavior of this threatened species. Such data are essential to the decision making processes. If, for example, tortoise populations are going to decline under the flight corridors, then the government agencies and public have a right to know and to use the information during the decision making processes.

19.6 Deficiency 3. Failure to discuss cumulative and indirect impacts to tortoise populations from the proposed action. Tortoise populations in the western Mojave Desert are already in a serious state of decline, and if the Bureau proceeds with Alternative VI, the situation will become increasingly acute. The impacts are not merely limited to losses or gains in acreage shown in tables, but include fragmentation, reduction of habitat to small and inviable islands, and promotion of conflicting uses (urban development) adjacent to prime habitat. Far more habitat will be lost from indirect influences and impacts than is described in the EIS/EIR. The Bureau should deal with this situation in the final EIS/EIR.

19.7 3. The Status of the Desert Tortoise. The Bureau underplays the status of the desert tortoise in several respects (pg. 3-16). In 1985 the U. S. Fish and Wildlife Service found that federal listing is warranted but precluded by other high priorities. The Bureau has reported to Desert Tortoise Council members that tortoise populations in the western Mojave Desert are declining at a very rapid rate, especially in the last six to seven years. Such information should be presented here to give an overall picture of the situation. The high densities shown in the figures are

19.5 See response to 19.1 and 19.3 above.

19.6 See Additions, Corrections, and Deletions, Table 6.1 of the final EIS/EIR.

19.7 BLM and San Bernardino County recognize the apparent declines in desert tortoise populations over the last 10 years. This is one of the reasons that the LTA project may prove beneficial. Consolidating some portions of public lands to exclude private development and the sometimes harmful activities of humans would most likely benefit remaining tortoise populations. Additional tortoise habitat would be consolidated and retained under public ownership under the final Proposal (Alternative VII).

unlikely to be accurate because of the declines.

4. Growth Inducing Effects of Project. We disagree with the Bureau's assessment of the growth inducing aspects of Alternative VI, the proposed action. The final statements are in conflict with statements in the body of the text and with the current growth patterns.

SPECIFIC COMMENTS

1. On pp. 3-16 to 3-17, preparers of the document use inappropriate material and references to describe tortoise activity, habitat, and food habits. Much material is drawn from research in other regions (e.g., the Eastern Mojave Desert), taken from paraphrased secondary or tertiary references, or not current. The Bureau has an extensive data base and numerous source documents on the desert tortoise. These documents should be used in revisions and corrections of this EIR/EIS. 19.8

   The material on food habits is particularly in error. The preparers used data from the Eastern Mojave. The results are not applicable in Western Mojave Desert.

2. Some material on threatened and endangered plants on pg. 3-23 is incorrect. Hemizonia arida is officially listed by the state. Table 3.5 should be corrected to show both state and federal listings.

3. Figure 1.1 and elsewhere. There is no such area as the Mojave Desert Tortoise Natural Area. The correct name is the Desert Tortoise Research Natural Area and Area of Critical Environmental Concern.

4. Page 1-6 and elsewhere. Four issues are identified for the Land Tenure Adjustment Project, but resource values are not included. Identified as issues are: landownership patterns, multiple use classifications, land use categories, and public health and safety. 19.9

19.10 We request that this document (and the proposed action) be evaluated by the U. S. Fish and Wildlife Service for potential impacts to the desert tortoise.

Thank you for the opportunity to comment. We would be glad to help your office design a study on the effects of aircraft noise on the desert tortoise.

Sincerely,

Glenn R. Stewart, Ph.D.
Senior Co-Chairman

cc: U. S. Fish and Wildlife Service
California Dept. of Fish and Game
San Bernardino County
Defenders of Wildlife
Desert Tortoise Preserve Committee

19.8 See Additions, Deletions and Corrections, Table 6.1 of the final EIS/EIR.

19.9 A planning issue is normally stated in broad resource management terms which suggest the nature of the conflicts and activities associated with the the issue. The issues of landownership patterns and multiple use classifications directly affect the resource values of concern through manageability by BLM. Land use categorization by the County would also affect these resources. The resources values of concern are specifically addressed in terms of the the existing environment and the effects of implementing any of the 7 alternatives in chapters 3 and 4 of the draft and final EIS/EIR.

19.10 The draft EIS/EIR was reviewed by the U.S. Fish and Wildlife Service (see comment letter 18) and the California Department of Fish and Game (see comment letter 8).

DESERT TORTOISE PRESERVE COMMITTEE, INC.
P.O. BOX 453
RIDGECREST, CALIF. 93555

RECEIVED
1987 NOV 16 AM 11: 39
BARSTOW RESOURCE AREA
BARSTOW, CA.

November 7, 1987

Mr. Alden Sievers
Barstow Area Office
Bureau of Land Management
150 Coolwater Lane
Barstow, CA 92311

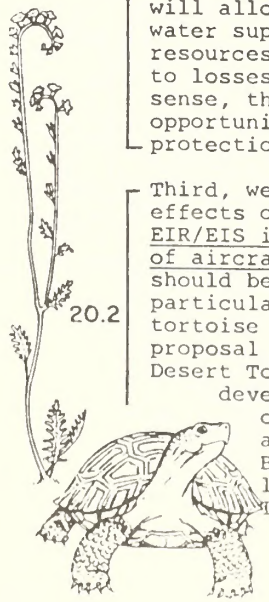
SUBJECT: Land Tenure Adjustment Project

Dear Alden:

We have reviewed the draft EIS/EIR for the Western Mojave Land Tenure Adjustment Project and have a number of comments.

20.1 First, we want to go on record as opposing Alternative VI and supporting Alternative V. Alternative V obviously has the most to offer the desert tortoise in a long-term sense. In contrast, the BLM's proposal for Alternative VI allows for substantial losses to crucial habitat, declines in high density populations, and impacts from growth-inducing activities on remaining, fragmented populations.

Second, Alternative V offers the most protection for valuable resources on public lands in the western Mojave Desert. Alternative V will have the effect of confining urban, industrial, and agricultural growth to already existing pockets of development. In addition, Alternative V will allow growth to remain within capacity of existing water supplies, etc. The BLM should be maximizing the resources of public lands in this EIR/EIS, not contributing to losses in an already threatened area. In a long term sense, the BLM also should be maximizing open space opportunities for southern Californians through careful protection of remaining lands.



20.2 Third, we request that you undertake a major study on the effects of aircraft sounds on the desert tortoise. The EIR/EIS is deficient without an evaluation of the impacts of aircraft noise on the tortoise. The results of the study should be included in the final copy of the EIR/EIS. We are particularly interested in the impacts of noise on the tortoise because we recently reviewed a major project proposal for development of private lands adjacent to the Desert Tortoise Research Natural Area. The proposed development will have high noise impacts from vehicles on the Natural Area. We have learned a great deal about noise through working with Dr. Bayard Brattstrom and reading the literature. We have also learned more about the behavior of the tortoise. Tortoises vocalize and can respond positively or

Letter 20 - Desert Tortoise Preserve Committee, Inc./Moncsko

20.1 Alternative VII, the final project proposal, was developed after consultation with representatives of the Desert Tortoise Council, the California Department of Fish and Game, and BLM biologists. It was developed to better address the consolidation and retention of desert tortoise habitat, while still providing enough of an exchange base to allow the project to be implemented with voluntary exchange, and meeting overall project objectives.

negatively to sounds. The ability to vocalize and respond to sounds is critical to normal behavior and survivorship. For example tortoises can hear ravens call and will respond by leaving the area. Tortoises normally live in a very quiet environment. The decibel levels and sound attenuation of their calls are unknown. With the intensely loud sonic booms and test flights of the B-1 bomber and other test aircraft, there is very high potential for hearing impairment. We refer you to the following documents, some of which are in BLM offices:

20.2

Vocalization in the Desert Tortoise, Gopherus agassizi, by R. G. Patterson (1972). California State University at Fullerton. M. A. Thesis.

Ambient Sound Pressure Levels in the California Desert by M. C. Bondello and B. H. Brattstrom (1978). U. S. Bureau of Land Management, Riverside, CA. Contract report.

The Experimental Effects of Off-road Vehicle Sounds on Three Species of Desert Vertebrates by M. C. Bondello and B. H. Brattstrom (1979). U. S. Bureau of Land Management, Riverside, CA. Contract report.

Fourth, we believe the EIS/EIR is deficient in discussion of cumulative and indirect impacts of the Land Tenure Adjustment proposal on tortoise populations and habitat. During the last year we have worked with you in the Desert Tortoise Work Group. We frequently discussed the problems of habitat fragmentation, minimum viable populations, formation of small islands, etc. The BLM's preferred alternative, Alternative VI, will have far reaching cumulative and indirect impacts on the species. These impacts are not even touched upon in the document. Cumulative and indirect impacts should be treated in the context of the existing high rates of declines, using the Bureau's data from desert tortoise monitoring plots.

20.3

20.4 Finally, please have your people place the official BLM name on all figures showing the Desert Tortoise Research Natural Area. It is not the Mojave Desert Tortoise Natural Area.

Thank you for the opportunity to comment.

Sincerely,

George E Moncsko

George Moncsko, President

cc: U. S. Fish and Wildlife Service
California Dept. of Fish and Game
Defenders of Wildlife
NRDC

20.2 See responses to comments 19.3 and 19.4.

20.3 See response to comment 19.7.

20.4 See Additions, Corrections, and Deletions, Table 6.1 of the Final EIS/EIR.

Nov. 12, 1987

21.1 I am concerned because apparently the draft EIS does not discuss mitigation measures for the loss of tortoise habitat.

21.2 BLM must resist land grabs by the military. This is not multiple use. The military "wannts", but does it need" ??

The military must not be allowed to usurp our valuable heritage of resources with a scorched earth policy on our public lands.

Mary Ann Henry

Mary Ann Henry

Letter 21 - Mary Ann Henry

21.1 Consolidation of additional habitat, along with retention of the more usable areas currently under BLM management, would result in a net increase in desert tortoise habitat under BLM management in alternative VII, the final project proposal.

21.2 All public lands in consolidation and retention zones would remain under the management of the BLM as directed by law and regulation.

Southern California Edison Company
P. O. BOX 410
100 LONG BEACH BOULEVARD
LONG BEACH, CALIFORNIA 90801
REAL PROPERTIES DEPARTMENT
TELEPHONE
(213) 491-2927

RECEIVED
BUREAU OF LAND MANAGEMENT
1987 NOV 18 AM 11:02
BARSTOW RESOURCE AREA
BARSTOW, CA.

Mr. Alden Sievers, Manager
Barstow Resource Area
Bureau of Land Management
150 Coolwater Lane
Barstow, CA 92311

November 13, 1987

Dear Mr. Sievers:

SUBJECT: Western Mojave Land Tenure Adjustment
Project: Draft Environmental Impact
Statement/Report

In response to your Federal Register Notice of August 17, 1987, Southern California Edison Company (Edison) has reviewed the Draft Western Mojave Land Tenure Adjustment Project Environmental Impact Statement/Report (DEIS/DEIR). Our review indicated that alternatives I-III would be more favorable for our distribution system, since alternatives IV-VI could require some undergrounding of Edison's distribution facilities. In addition, in response to the comment on page 3-60 indicating a potential conflict with Edison's Coolwater-Kramer 220 kV T/L in Corridor Q at the southernmost boundary of the supersonic/low level flight corridor, although the Coolwater-Kramer T/L is generally over four miles south of the corridor, Edison would recommend that the Air Force's low level aircraft flight patterns be adjusted to avoid any collision with the towers. This comment also applies to Edison's lines along the west side of Highway 395 within the Consolidation Zone. 22.1

Edison supports the DEIS/DEIR's recognition of the importance of preserving the utility corridors identified in the California Desert Plan and the advisability of locating new linear facilities within designated corridors. We would request, however, that the DEIS/DEIR specifically acknowledge and support the upgrading of the existing T/Ls in designated corridors as an additional means of transmitting energy to meet the needs of Southern California.

Letter 22 - Southern California Edison Company - Miller

22.1 See Additions, Corrections, and Deletions, Table 6.1. No conflicts with powerlines in existing corridors have occurred. The use of known corridors is compatible with Air Force low level overflight of the area, as long as tower height of new lines is not over about 120 feet. Even then, close coordination between utility companies and agencies can prevent conflicts. Upgrading of existing utility corridors is recognized as the best means to resolve additional energy needs, and the location of these corridors is recognized in agency land use plans.

Edison is pleased to have the opportunity to comment on the DEIS/DEIR and would be happy to work with your staff to implement our comments. If you have questions, please call Lucina Lea Moses at (213) 491-2397.

Very truly yours,

D. L. MILLER
Supervisor of
Project Licensing & Planning

WPC5332/gs

cc: J. R. Eckman
F. R. Klumb
W. R. Ostrander

Defenders
OF WILDLIFE

November 12, 1987

Mr. Alden Sievers
Area Manager
ATTN: Land Tenure Adjustment Project
Barstow Resource Area
U.S. Bureau of Land Management
150 Coolwater Lane
Barstow, CA 92311

Dear Mr. Sievers:

Defenders of Wildlife submits this letter as our comments and recommendations on the Draft Environmental Impact Statement/ Report (DEIS/EIR) for the Western Mojave Land Tenure Adjustment Project. Please consider our input, and include this letter in the appropriate public record.

23.1 At the outset, we are greatly disappointed with this DEIS/EIR on both procedural and substantive grounds. Procedurally, this DEIS/EIR does not include consideration and analysis of an alternative which would maximize wildlife and habitat conservation objectives. The National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA), and their implementing regulations, require that EISs and EIRs provide a reasonable array of alternatives, and reflect issues raised during scoping. In this instance, Defenders and others submitted scoping comments requesting consideration of impacts on wildlife--especially desert tortoises--and how land tenure adjustments could increase conservation benefits. We believe that this DEIS/EIR is defective because no alternative presented could be honestly characterized as an "optimal" or "maximum" wildlife conservation alternative. Similarly, with one exception, all configurations of the alternatives would result in a loss of important desert tortoise habitats (Tables 4.1 and 4.2). To remedy these defects, we recommend preparation and public comment on a Supplemental DEIS/EIR with an optimal wildlife/tortoise alternative, and with more accurate and candid treatment of conservation concerns.

Substantively, we are appalled that the preferred alternative would result in "... net losses of desert tortoise, Mohave ground squirrel, and Mohave vole habitats" (page iv) along with other acknowledged adverse impacts. NEPA and CEQA policies encourage adoption of less damaging alternatives (absent a finding of overriding concerns), and require mitigation for all unavoidable adverse impacts. This DEIS/EIR's preferred alternative has serious adverse impacts, but we find no persuasive finding of overriding concerns, nor a comprehensive mitigation plan.

CALIFORNIA OFFICE: 5604 ROSEDALE WAY, SACRAMENTO, CALIFORNIA 95822 • (916) 442-6386
NATIONAL OFFICE: 1244 NINETEENTH STREET, NW • WASHINGTON, DC 20036 • (202) 659-9510

Letter 23 - Defenders of Wildlife - Spotts

23.1 The National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA) require that an array of reasonable alternatives be addressed in the analysis. Alternatives that meet the criteria of reason would meet the needs of the project action. For this project, land tenure adjustment is needed to enable better management of public lands and more orderly development of private lands for specific Air Force, BLM, and County needs. This would be accomplished through voluntary exchange because it is recognized that purchase of intermingled private lands in consolidation zones is not feasible in terms of today's national budget. So, in order to obtain the lands we desire to manage, we must also give up other lands which we feel are difficult to manage, and that have a lower level of resource values. Alternative V would stretch our ability to provide an exchange base sufficient to obtain intermingled private lands in consolidation zones and result in continued management problems for San Bernardino County and BLM. Alternative VII was developed after consultation with desert tortoise specialists and a hard look at the areas that the Air Force actually needed. It would provide greater benefits to the tortoise than Alternative VI, and would provide enough of an exchange base to accomplish the objectives of the LTA Project. See the discussion of Alternative VII in chapters 2 and 4 of the the final EIS/EIR.

Defenders OF WILDLIFE

23.2 The DEIS/EIR's preferred alternative (alternative VI) would have substantial adverse impacts on desert tortoises and their habitats. These impacts would include direct habitat loss, indirect losses due to increased human activities, and genetic/viability harm by greater fragmentation and isolation of tortoise populations. These impacts are given short shift in the DEIS/EIR. For example, noise pollution--especially from military aircraft and off-road vehicles--is known to harm some wildlife species. The preferred alternative would allow more noise pollution, which would harm wildlife. These noise pollution concerns and impacts vis-a-vis tortoises and other wildlife species should be carefully studied and considered before management decisions occur.

23.3 We question the DEIS/EIR's preferred alternative and its admitted harm to desert tortoises given this species' status as a BLM "sensitive species" (supposedly protected under the BLM Manual), and as a candidate species under both the federal and state endangered species laws. The basic intent of these laws and BLM policy is to foster recovery of candidate and/or sensitive species to avert endangered or threatened listing. This preferred alternative, however, violates this recovery intent and, if implemented, will constitute another step toward federal and/or state listing. In this regard, we trust that both the U.S. Fish and Wildlife Service and the Department of Fish and Game have ample opportunities to review and comment on this DEIS/EIR. We would welcome copies of their input, and any responses.

Of course, we recognize that land tenure adjustments often provide an opportunity to block up and consolidate public lands ownership and management which may be beneficial to wildlife and habitat conservation. Unfortunately, this preferred alternative "fumbles" a positive opportunity, and instead turns it into a threat to wildlife and habitat conservation. Indeed, on page 4-45, the preferred alternative is acknowledged as "... the smallest area of wildlife habitat of all the alternatives."

In summary, we request a Supplemental DEIS/EIR to address the above and other concerns. We vigorously oppose the preferred alternative, Alternative VI. Among the alternatives offered, we support Alternative V as providing the most relative benefits for tortoises. We also endorse and incorporate by reference the comments submitted by the Desert Tortoise Council.

23.4 Please send us, at the Sacramento address, a copy of the Supplemental DEIS/EIR and/or Final EIS/EIR. Thank you very much for your assistance, and for considering our views.

Sincerely,

Richard Spotts
California Representative
Defenders of Wildlife

cc: Interested parties

23.2 See responses to comments 19.3 and 19.4.

23.3 The basic intent of the LTA Project is to resolve the problems associated with substantial private inholdings within areas that could otherwise be more effectively managed by BLM. These inholdings threaten BLM's long-term management authority and the natural integrity of habitats for desert tortoise and other species. Development of these inholdings could destroy tortoise habitat and disrupt BLM management on adjacent public lands. The LTA project proposal is a cooperative effort between the Air Force, the County of San Bernardino, and BLM in the hope of solving the inholdings problem. We requested and received assistance in development of our final project proposal (Alternative VII) from representatives of the California Department of Fish and Game and the Desert Tortoise Council. Implementation of Alternative VII would enhance coordinated BLM management; improve protection for the tortoise populations; reduce potential future land use conflicts; and compensate inholders for the market value of their property without massive federal budget appropriations. See comment letters 8 and 19 for the comments from the California Department of Fish and Game and the U.S. Fish and Wildlife Service on the draft EIS/EIR.

23.4 The development of Alternative VII included portions of several of the previous alternatives (IV, V, and VI). It is presented in detail in chapters 2 and 4 of the final EIS/EIR.

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
P.O. BOX 2711
LOS ANGELES, CALIFORNIA 90053-2325

November 24, 1987

REPLY TO
ATTENTION OF

Office of the Chief
Environmental Resources Branch

RECEIVED
BUREAU OF LAND MANAGEMENT
1987 DEC -2 AM 11:06
BARSTOW RESOURCE AREA
BARSTOW, CA.

ATTN: Land Tenure Adjustment Project
Barstow Resource Area
Bureau of Land Management
150 Coolwater Lane
Barstow, California 93211

Ladies and Gentlemen:

We have reviewed the Draft Environmental Impact Statement/Enviornmental Impact Report (EIS/EIR) for the Western Mojave Land Tenure Adjustment Project, as requested in a letter from your office, dated July 1987.

24.1 Work in waters of the United States might require a permit under Section 404 of the Clean Water Act or Section 10 of the Rivers and Harbors Act. We cannot determine from the submitted information the extent of the Corps' jurisdiction over this project. Please give our Regulatory Branch documentation that clearly describes the area and extent of any proposed work in watercourses and adjacent wetlands to help us make that determination.

24.2 If the proposed project involves any Federal assistance through funding or permits, compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470f) and implementing regulations, 36 CFR 800, will be required.

The proposed plan does not conflict with navigation, flood control, or existing or authorized plans or programs of the Corps of Engineers. We have no comments on the EIS/EIR.

Thank you for the opportunity to review and comment on this document.

Sincerely,

Brian M. Moore

for Robert S. Joe
Chief, Planning Division

Letter 24 - Department of the Army - Joe

24.1 No work in watercourse or wetlands is proposed as part of the Western Mojave Land Tenure Adjustment project.

24.2 Specific analyses of individual parcels proposed for exchange will occur as part of a second tier assessment. BLM is familiar with the requirements of Section 106 of the National Historic Preservation Act of 1966.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

RECEIVED
1987 DEC 18 AM 11: 18
BARSTOW RESOURCE AREA
BARSTOW, CA.

DECEMBER 14, 1987

Daryl Albiston
ATTN: Land Tenure Adjustment Program
Barstow Resource Area
U.S. Bureau of Land Management
150 Coolwater Lane
Barstow, California 92311

Dear Mr. Albiston:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled WESTERN MOHAVE LAND TENURE ADJUSTMENT PROGRAM, SAN BERNARDINO COUNTY, CALIFORNIA. EPA offers the enclosed comments for your consideration.

25.0 Under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, EPA is required to review and comment on this DEIS.

We have classified this DEIS as Category LO, Lack of Objections (see the attached "Summary of Rating Definitions and Follow-up Actions").

We appreciate the opportunity to review this DEIS. Please send us three copies of the Final Environmental Impact Statement (FEIS) at the same time it is officially filed with EPA's Washington, D.C. office. If you have any questions, please call me at 415-974-8083 (FTS 454-8083) or have your staff contact David Tomsovic at 415-974-8177 (FTS 454-8177).

Sincerely yours,

Deanna M. Wieman

Deanna M. Wieman, Director
Office of External Affairs

25.1 Enclosures

cc: Keith Turner, Lahontan RWQCB, Board VI
15371 Bonanza Rd., Victorville CA 92392

Ed Hastey, BLM State Director
2800 Cottage Way, Rm. 2841, Sacramento CA 95825

Letter 25 - U.S. Environmental Protection Agency - Wieman

25.0 Thank you for reviewing this EIS/EIR, and for providing a contact person.

25.1 Enclosures not included.